

1 ROBINS, KAPLAN, MILLER & CIRESI L.L.P.
 2 Roman M. Silberfeld, Bar No. 62783
 3 RMSilberfeld@rkmc.com
 4 Bernice Conn, Bar No. 161594
 5 BConn@rkmc.com
 6 Michael A. Geibelson, Bar No. 179970
 7 MAGEibelson@rkmc.com
 8 David Martinez, Bar No. 193183
 9 DMartinez@rkmc.com
 10 Laura E. Nelson, Bar No. 231856
 11 LENelson@rkmc.com
 12 2049 Century Park East, Suite 3400
 13 Los Angeles, CA 90067-3208
 14 Telephone: 310-552-0130
 15 Facsimile: 310-229-5800

16 *Attorneys For Plaintiffs Best Buy Co., Inc.; Best Buy*
 17 *Purchasing LLC; Best Buy Enterprise Services,*
 18 *Inc.; Best Buy Stores, L.P.; BestBuy.com, L.L.C.;*
 19 *and Magnolia Hi-Fi, Inc.*

20
21
22
23
24
25
26
27
28

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

IN RE TFT-LCD (FLAT PANEL) ANTITRUST
LITIGATION

Master File No. 07-MD-1827 SI
MDL No. 1827

This Documents Relates To:

Individual Cases:
Case No. 10-CV-4572
Case No. 12-CV-4114

Best Buy Co., Inc. v. AU Optronics Corp., et al.,
Case No. 10-CV-4572

**BEST BUY'S TRIAL BRIEF RE:
FRCP 1006 SUMMARY WITNESS
RE:**

Best Buy Co., Inc. v. Toshiba Corp. et al.,
Case No. 12-CV-4114

**1. GUILTY PLEAS AND
JUDGMENTS; AND**

**2. CORPORATE OWNERSHIP
DOCUMENTS**

The Honorable Susan Illston

I.

INTRODUCTION

Best Buy intends to call Daniel Gill on Monday, August 5, 2013 to summarize voluminous records of guilty pleas and corporate ownership documents. Mr. Gill is a proper summary witness under Rule 1006 because the underlying materials, which comprise dozens of documents and thousands of pages, are voluminous and admissible. *See* Fed R. Evid. 1006. Best Buy disclosed its intention to call a summary witness on these topics in its June 25, 2013 witness list (Dkt. 8179, at pg. 8, items 76-77), and disclosed Mr. Gill on July 23, 2013 as a witness Best Buy intends to call live.

Best Buy also moves for the admission of the records that Mr. Gill will summarize. Best Buy made this evidence available to Defendants in connection with its Exhibit List on June 24, 2013 (Dkt. 8179), and is doing so again here.¹

Evidence of Guilty Pleas

Evidence of the guilty pleas (and related judgments and sentencing memorandums) of corporate entities who participated in the global LCD price fixing conspiracy is relevant and admissible. This evidence is relevant to prove the scope and extent of the conspiracy, as well as to rebut contradictory lay and expert testimony, including testimony already presented at this trial attempting to limit the scope of the conspiracy. As shown below, the Rule 803(22) hearsay exception broadly applies to criminal judgments, as well as documents underlying the judgment, including guilty pleas and sentencing memorandums. *See, e.g., United States ex rel. Miller v. Bill Harber Int'l. Constr., Inc.*, 608 F.3d 871 (D.C. Cir. 2010); *Bulletin Displays, LLC v. Regency Outdoor Adver., Inc.*, 448 F. Supp. 2d 1172, 1184 (C.D. Cal. 2006).

Evidence of Corporate Ownership

Evidence of the corporate relationships of various defendant and co-conspirator entities – predominantly in the form of corporate Annual Reports and SEC filings – is relevant to establish Best Buy's direct purchases under the Sherman Act. The evidence is admissible because Best

¹ Best Buy also produced its evidence establishing corporate relationships in connection with its Request for Judicial Notice filed on June 18, 2013. *See* Dkt. 8135.

1 Buy has obtained and produced custodian of records declarations under FRE 902(12) and 803(6)
 2 authenticating the evidence and establishing the business records foundation for its admission.
 3 See Silberfeld Declaration, at Exh. B.

4 Defendant's Failure To Stipulate to Authenticity and Business Records Character of
 5 Corporate Ownership Documents

6 In its Final Pretrial Scheduling Order, the Court Ordered that the parties work together "to
 7 enter reasonable stipulations concerning authenticity, business records status and admissibility of
 8 documents, and concerning corporate relationships among subsidiaries and affiliates." Dkt. 8298,
 9 at pg. 8.

10 Defendants have ignored repeated requests that they stipulate to the admissibility of
 11 documents establishing corporate ownership and/or to the fact of those relationships. See
 12 Silberfeld Decl., at Exh. E. Best Buy produced custodians of records declarations on July 12, 18
 13 and 24 establishing the authenticity and business records character of this evidence. On July 18,
 14 24 and 31, 2013, Best Buy requested that Defendants stipulate to the admissibility of these
 15 records and of the ownership relationships they establish. Defendants have not responded.

16 As such, Best Buy requests that the Court charge Defendants with the time required to
 17 establish these relationships. See July 9 Transcript, at 8295, at pg. 9:17-23 ("So, I'm telling you
 18 right now that if that's how it starts to work during the trial, then whoever in the Court's view is
 19 being unreasonable about things that ought not be disputed, then that person is going to find --
 20 that party will find itself in a position where some of its time may be allocated to having resolved
 21 an issue that should have been resolved in advance.").

II.

ARGUMENT**A. Best Buy Has Established The Requisite Foundation for Mr. Gill's Testimony Under Rule 1006**

Rule 1006 provides that:

The proponent may use a summary, chart, or calculation to prove the content of voluminous writings, recordings, or photographs that cannot be conveniently examined in court. The proponent must make the originals or duplicates available for examination or copying, or both, by other parties at a reasonable time and place. And the court may order the proponent to produce them in court.
Id.

Best Buy has met each of these requirements because: (1) the underlying documents are voluminous and admissible; (2) the documents were made available to Defendants on June 25, 2013 and Best Buy produced custodians of records declarations as they became available on July 12, 18 and 24; and (3) Mr. Gill will be subject to cross-examination. *See Frank Music Corp. v. Metro-Goldwyn-Mayer, Inc.*, 772 F.2d 505, 515, fn. 9 (9th Cir. 1985) ("Plaintiffs had ample opportunity to cross-examine MGM Grand's Vice-President of Finance, under whose direction the summary was prepared. Any inaccuracies in the cost estimates could have been brought out on this cross-examination.").

B. Evidence of Guilty Pleas is Voluminous and Admissible

This Court has repeatedly denied Defendants' *in limine* motions to exclude guilty pleas of corporate entities who participated in the global LCD price fixing conspiracy. *See, e.g.*, Dkt. No. 8298, at pg. 5 (denying HannStar's motion in this action); Dkt. 5597, at pg 7 (denying Toshiba's motion in the DPP action).

Guilty pleas and other documents underlying judgments in criminal proceedings are, of course, admissible under Rule 803(22). In *United States ex rel. Miller v. Bill Harber Int'l. Constr., Inc.*, 608 F.3d 871, the D.C. Circuit held that a co-defendant's plea agreement and Rule 11 memorandum are admissible under Rule 803(22):

That is, because this is a civil case, [the co-defendant's] guilty plea may be admitted under Rule 803(22) against all the defendants as long as the plea was admitted "to prove any fact essential to sustain the

judgment” . . . [T]he Rule 11 memorandum clearly states more than the bare conclusion that [the co-defendant] was guilty. Instead, it asserts the several facts already mentioned: that [the co-defendant] and others submitted bids and made payments as part of a bid-rigging conspiracy . . . Each of those facts is essential to sustain the legal conclusion of [the co-defendant’s] guilt under Section 1 of the Sherman Act, and therefore fell within the scope of the rule.

Id., at 892.

Other courts have reached the same conclusion. *See, e.g., Scholes v. Lehmann*, 56 F.3d 750, 762 (7th Cir. 1995) (plea agreement of Ponzi scheme ringleader was admissible hearsay under Rule 803(22) against other defendants in subsequent civil fraudulent conveyance action); *Bulletin Displays, LLC v. Regency Outdoor Adver., Inc.*, 448 F. Supp. 2d 1172, 1184 (C.D. Cal. 2006) (plea agreement admissible under Rule 803(22) and not barred by hearsay rule) (citation omitted); *United States v. 47 mm Cannon*, 95 F. Supp. 2d 545, 548 (E.D. Va. 2000) (Rule 803(22) permitted the government to use a plea agreement to prove the elements required in a civil forfeiture proceeding); *Guillermety v. Gonzales*, 491 F. Supp. 2d 199, 201 (D.P.R. 2006) (one defendant’s guilty plea was admissible under Rule 803(22) to establish all defendants’ liability).

In fact, reflecting the broad scope of the Rule 803(22) exception, courts also admit into evidence *foreign indictments* under Rule 803(22). *See Mike’s Train House, Inc. v. Lionel, L.L.C.*, 472 F.3d 398, 412 (6th Cir. 2006) (holding that Korean court records, including indictments, were admissible under Rule 803(22)). Thus, co-conspirator and individual employee guilty plea evidence for the truth of the matter asserted is admissible under Rule 803(22).²

² Even if Rule 803(22) did not apply to co-conspirator and individual guilty plea evidence (and it does), this evidence would still be admissible hearsay under the Fed. R. Evid. 807 residual exception. *See In re Slatkin*, 525 F.3d 805, 811-13 (9th Cir. 2008) (holding that plea agreement was admissible under Rule 807 after it could not determine which hearsay exception the bankruptcy court relied upon in admitting plea agreement). Like *In re Slatkin*, where the Ninth Circuit observed that the plea agreement was more probative of fraudulent intent than other evidence because direct proof of fraudulent intent is rarely available, *id.* at 812, it is well-recognized that direct evidence to support an antitrust conspiracy claim is “frequently difficult for antitrust plaintiffs to come by.” *Rossi v. Standard Roofing, Inc.*, 156 F.3d 452, 465 (3d Cir. 1998). This is certainly true here, where the plea agreements evidence both the existence of unlawful price-fixing agreements as well as their effect on LCD panel pricing, and where some witnesses in this trial have provided equivocal testimony about competitor agreements or testified that they did not determine pricing based on agreements between conspirators or that the conspiracy was not “effective.”

Further, evidence of guilty pleas, including those entered into by co-conspirators and individual employees, is admissible to prove the existence of, as well as the extent and scope of the conspiracy alleged by Plaintiffs – *e.g.*, that an industry-wide conspiracy in the LCD Panel market existed, that Defendants and other co-conspirators participated in that conspiracy, and that there were acts committed in furtherance of that conspiracy. Indeed, evidence of prior guilty pleas of other co-conspirators is relevant *prima facie* evidence against all members of that conspiracy in a subsequent civil suit. *See, e.g., Miller v. Holzmann*, 563 F. Supp. 2d 54, 82, 84-85 (D.D.C. 2008) (surveying cases and admitting one defendant’s guilty plea to establish the liability of other defendants, and holding that facts recited in a guilty plea and Rule 11 memorandum of a defendant in a prior antitrust case was admissible in a subsequent civil case against all defendants to prove that a conspiracy of the type alleged by the government existed)³; *RSBI Aerospace, Inc. v. Affiliated FM Ins. Co.*, 49 F.3d 399, 401, 403 (8th Cir. 1995) (non-party employee’s guilty plea and accompanying sworn statement were admissible against defendant employer in subsequent civil case); *Newby v. Enron Corp.*, 491 F. Supp. 2d 690, 703 (S.D. Tex. 2007) (same); *Guillermety v. Gonzales*, 491 F. Supp. 2d at 201 (same).⁴

This evidence is also relevant to rebut testimony from any witnesses that the LCD market was competitive or that they did not determine pricing based on agreements with their competitors. It is also relevant to rebut any expert testimony proffered by the Defendants that the conspiracy was not “effective.” *See Miller*, 563 F. Supp. 2d at 82 (statement in Rule 11 memorandum that conspirators met and agreed “to increase the price level of bids on USAID-funded Contracts” was relevant to whether defendant caused damages to the United States because statement was evidence that the United States paid more on these contracts than it otherwise would have absent collusion).

³ *Aff’d in part, vacated in part on other grounds by United States ex rel. Miller v. Bill Harbert Int’l Constr., Inc.*, 608 F.3d 871 (D.C. Cir. 2010).

⁴ *See also* ABA Section of Antitrust Law, Model Jury Instructions in Civil Antitrust Cases, 2005 Edition (2005), G-24 (with respect to a prior antitrust conviction, juries were instructed that they “may use such conviction and findings of fact that support it, without more, to resolve issues in this case that are the same as the ones in the prior case.”).

Further, the evidence is voluminous, comprising 71 documents and hundreds of pages. *See Silberfeld Decl.*, at Exh. A; *cf. United States v. Possick* (8th Cir. 1988) 849 F.2d 332, 339 (chart summarizing 20 drug transactions admissible where underlying documentation was voluminous). Best Buy made the documents available to Defendants for inspection when it disclosed its Exhibit List on June 25, 2013 (*see* Dkt. 8179) ⁵, and is identifying them again by way of this Trial Brief. *See Silberfeld Decl.*, at Exh. A.

Finally, Best Buy's proposed Rule 1006 summary sets forth relevant information from the guilty pleas and judgments in neutral fashion in chart format, and Mr. Gill will be available for cross-examination. *See Frank Music Corp.*, 772 F.2d at 515.

C. Evidence of Corporate Relationships is Voluminous and Admissible

Mr. Gill will also summarize voluminous records establishing the ownership relationships for Samsung, Sharp, Toshiba, LGE, Philips, Panasonic, and NEC through the graphics attached as Exhibit D. These graphics depict these relationships in simple, neutral fashion. The underlying evidence consists of Annual Reports and SEC statements documenting the corporate relationships, as well as several press releases issued by certain entities about their corporate structure. *See Exh. C*.

Best Buy has established the foundation for the admission of each of these documents through custodian of records declarations authenticating the documents and establishing that they are business records. *See Silberfeld Del.*, at Exh. B (declarations); *cf. Fed. R. Evid.* 803(6) and 902(11), (12). Under Rule 902(11) and (12), certified domestic and foreign records of regularly conducted activity are self-authenticating. *Id.* Under Rule 803(6), the documents are admissible as business records. *Id.* Further, the records comprise dozens of annual reports and financial statements and thousands of pages and are therefore voluminous under Rule 1006. *See Exh. C*.

⁵ Best Buy has marked several additional documents as Exhibits since it served its Exhibit list, including custodian of records declarations and certain press releases. *See* Best Buy Trial Exhibit Nos. 2819-2838.

1 **III.**

2 **CONCLUSION**

3 For these reasons, the Court should admit evidence of guilty pleas and judgments related
 4 to the LCD price fixing conspiracy, as well as documents evidencing corporate relationships.
 5 Further, the Court should Order that the time spent by Best Buy in introducing this evidence
 6 should be charged against Defendants' trial time.

7
 8 Dated: August 1, 2013

ROBINS, KAPLAN, MILLER & CIRESI L.L.P.

9
 10 By: /s/ Roman M. Silberfeld

Roman M. Silberfeld

Bernice Conn

Michael A. Geibelson

David Martinez

Laura E. Nelson

11
 12
 13 Attorneys For Plaintiffs

14 BEST BUY CO., INC.; BEST BUY PURCHASING
 15 LLC; BEST BUY ENTERPRISE SERVICES, INC.;
 16 BEST BUY STORES, L.P.; BESTBUY.COM, L.L.C.;
 17 and MAGNOLIA HI-FI, INC.
 18
 19
 20
 21
 22
 23
 24
 25
 26
 27
 28

ROBINS, KAPLAN, MILLER & CIRESI L.L.P.
 ATTORNEYS AT LAW
 LOS ANGELES

DECLARATION OF ROMAN M. SILBERFELD

I, ROMAN M. SILBERFELD, declare as follows:

1. I am a partner with the law firm of Robins, Kaplan, Miller & Ciresi L.L.P., counsel for Plaintiffs Best Buy Co., Inc., Best Buy Purchasing LLC, Best Buy Enterprise Services, Inc., Best Buy Stores, L.P., Bestbuy.com, L.L.C., and Magnolia Hi-Fi, Inc. (collectively “Best Buy”) in the above-captioned action currently pending in the U.S. District Court for the Northern District of California. I submit this declaration in support of Best Buy’s Trial Brief re FRCP 1006 Summary Witness Re: 1. Guilty Pleas and Judgments; and 2. Corporate Ownership Documents.

2. I have personal knowledge of the facts stated herein, and I could and would competently testify thereto if called as a witness.

3. Attached hereto as Exhibit A are true and correct certified copies of informations, sentencing memorandums, plea agreements and judgments of individuals and entities convicted of fixing prices for LCD panels in proceedings before this Court.

4. Attached hereto as Exhibit B is a true and correct copy of the following custodian of records declarations:

Trial Exhibit 2828	Business Records and Authenticity Declaration of Shinobu Obata, General Manager in the Legal Division of NEC Corporation, dated July 22, 2013;
--------------------	--

Trial Exhibit 2829	Business Records and Authenticity Declaration of Christoph Wolfsgruber, Group Chief Accountant and Financial Reporting for Philips International B.V., a subsidiary of Koninklijke Philips N.Y. (Philips) dated June 27, 2013;
--------------------	--

Trial Exhibit 2832	Business Records and Authenticity Declaration of Hirohisa Ikutomi (1), Manager of IR Disclosure Team, Global Finance Administration Center for Panasonic Corporation (Panasonic), dated July 23, 2013 (authenticating various Press Releases);
--------------------	--

Trial Exhibit 2830	Business Records and Authenticity Declaration of Hirohisa Ikutomi (2), Manager of IR Disclosure Team, Global Finance Administration Center for Panasonic Corporation (Panasonic), dated July 23, 2013 (authenticating various Matsushita Electric Industrial Co., Ltd. (Panasonic) Annual Reports);
--------------------	---

- 1 Trial Exhibit 2831 Business Records and Authenticity Declaration of Hirohisa Ikutomi
2 (3), Manager of IR Disclosure Team, Global Finance
Administration Center for Panasonic Corporation (Panasonic),
dated July 23, 2013 (Authenticating various Form 20-F Filings);
- 3 Trial Exhibit 2833 Business Records and Authenticity Declaration of Clara Chang,
4 Senior Manager of LG Electronics, USA, dated June 5, 2013;
- 5 Trial Exhibit 2834 Business Records and Authenticity Declaration of Hyoung-Geun
Park, Senior Manager of LG Electronics, Inc., dated July 12, 2013;
- 6 Trial Exhibit 2835 Business Records and Authenticity Declaration of Jihyeoun Jang,
7 Marketing Manager of LG Electronics, Inc., dated July 10, 2013;
- 8 Trial Exhibit 2836 Business Records and Authenticity Declaration of Dylan Dunavan,
General Counsel of NEC Display Solutions of America, dated July
9 16, 2013;
- 10 Trial Exhibit 2837 Business Records and Authenticity Declaration of Keiji Ushijima,
Associate Senior Vice President and General Manager of Legal and
11 IPR Division of NEC LCD Technologies, Ltd., dated July 22, 201;
and
- 12 Trial Exhibit 2838 Business Records and Authenticity Declaration of Kyusung Lee,
13 Vice President, Global Legal Affairs Team, Samsung Electronics,
dated July 18, 2013

14

15 5. Attached hereto as Exhibit C is description of evidence supporting certain
16 ownership relationships for Toshiba, Samsung, Sharp, LGE, Philips, Panasonic and NEC.

17 6. Attached hereto as Exhibit D is a true and correct copy of graphics that we propose
18 to use during the examination of summary witness Daniel Gil relevant to certain ownership
19 relationships for Toshiba, Samsung, Sharp, LGE, Philips, Panasonic and NEC. Exhibit D is
20 premised on the documents identified in Exhibit C, which in turn are authenticated by the
21 declarations set forth in Exhibit B above.

22 7. Best Buy produced custodians of records declarations on July 12, 18 and 24
23 establishing that Annual Reports and SEC filings are authentic and are business records.

24 8. We have repeatedly asked Defendants to stipulate to the admissibility of these
25 records and their business records character of these documents, as well as to the corporate
26 relationships among subsidiaries and affiliates.

27

28

EXHIBIT A

Criminal Document Inventory								
Exhibit No.	Date	Document Type	Document Description	Affiliated Co. / Co. Involved	U.S. District Court Information, Indictment, Plea, Verdict or Judgment Summary Details	Period	Incarceration	Fine
2032	2/4/2009	Indictment	Indictment: Cheng Yuan Lin, Wen Jun Cheng, and Duk Mo Koo	AUO	<p>Title 15, United States Code, Section 1 (Price Fixing): "From on or about September 14,2001, until on or about December 1, 2006 ("the period covered by this Indictment"), ... the defendants and other coconspirators entered into and engaged in a combination and conspiracy to suppress and eliminate competition by fixing the prices of thin-film transistor liquid crystal display panels ("TFT-LCD") in the United States and elsewhere. The combination and conspiracy engaged in by the defendants and other coconspirators was in unreasonable restraint of interstate and foreign trade and commerce in violation of Section 1 of the Sherman Act (15 U.S.C. § 1)....</p> <p>"During the period covered by this Indictment, defendant AU OPTRONICS CORPORATION was a Taiwan corporation with its principal place of business located in Hsinchu, Taiwan. Defendant AU OPTRONICS CORPORATION joined and participated in the conspiracy from at least as early as September 14, 2001 and continuing at least until December 1, 2006. During the period covered by this Indictment, defendant AU OPTRONICS CORPORATION was engaged in the business of producing and selling TFT-LCDs to customers in the United States and elsewhere....</p> <p>"Within the period covered by this Indictment, defendant AU OPTRONICS CORPORATION AMERICA was a wholly owned subsidiary of defendant AU OPTRONICS CORPORATION, and a United States corporation incorporated in the State of California with its principal place of business located in Houston, Texas. Defendant AU OPTRONICS CORPORATION AMERICA joined and participated in the conspiracy from at least as early as spring 2003 and continuing at least until December 1, 2006. Within the period covered by this Indictment, defendant AU OPTRONICS CORPORATION AMERICA was engaged in the business of selling TFT-LCDs to customers in the United States."</p>	9/14/01-12/1/06		

Exhibit No.	Date	Document Type	Document Description	Affiliated Co. / Co. Involved	U.S. District Court Information, Indictment, Plea, Verdict or Judgment Summary Details	Period	Incarceration	Fine
2070	6/10/2010	Indictment	Superseding Indictment	AUO	<p>Title 15, United States Code, Section 1 (Price Fixing): "From on or about September 14,2001, until on or about December 1, 2006 ("the period covered by this Indictment"), ... the defendants and other coconspirators entered into and engaged in a combination and conspiracy to suppress and eliminate competition by fixing the prices of thin-film transistor liquid crystal display panels ("TFT-LCD") in the United States and elsewhere. The combination and conspiracy engaged in by the defendants and other coconspirators was in unreasonable restraint of interstate and foreign trade and commerce in violation of Section 1 of the Sherman Act (15 U.S.C. § 1)....</p> <p>"During the period covered by this Indictment, defendant AU OPTRONICS CORPORATION was a Taiwan corporation with its principal place of business located in Hsinchu, Taiwan. Defendant AU OPTRONICS CORPORATION joined and participated in the conspiracy from at least as early as September 14, 2001 and continuing at least until December 1, 2006. During the period covered by this Indictment, defendant AU OPTRONICS CORPORATION was engaged in the business of producing and selling TFT-LCDs to customers in the United States and elsewhere....</p> <p>"Within the period covered by this Indictment, defendant AU OPTRONICS CORPORATION AMERICA was a wholly owned subsidiary of defendant AU OPTRONICS CORPORATION, and a United States corporation incorporated in the State of California with its principal place of business located in Houston, Texas. Defendant AU OPTRONICS CORPORATION AMERICA joined and participated in the conspiracy from at least as early as spring 2003 and continuing at least until December 1, 2006. Within the period covered by this Indictment, defendant AU OPTRONICS CORPORATION AMERICA was engaged in the business of selling TFT-LCDs to customers in the United States."</p>	9/14/01-12/1/06		
2087	3/13/2012	Jury Verdict Form	Special Verdict Form (Criminal trial): AU Optronics Corporation, AU Optronics Corporation America, Hsuan Bin "H.B." Chen, Hui Hsiung ("Kuma"), Lai-Juh "L.J." Chen, and Tsannrong "Hubert" Lee for violating Sherman Act as charged	AUO	Guilt found as to AU Optronics Corporation, AU Optronics Corporation America, Hsuan Bin "H.B." Chen, Hui Hsiung ("Kuma"), Lai-Juh "L.J." Chen, and Tsannrong "Hubert" Lee for violating Sherman Act as charged.	9/14/01-12/1/06		
2088	12/19/2012	Jury Verdict Form	Verdict Form (Criminal Trial): Steven Leung	AUO	Found guilty of violating the Sherman Act: Steven Leung	9/14/01-12/1/06		

Exhibit No.	Date	Document Type	Document Description	Affiliated Co. / Co. Involved	U.S. District Court Information, Indictment, Plea, Verdict or Judgment Summary Details	Period	Incarceration	Fine
2058	12/8/2009	Information	Information: Chi Mei	Chi Mei	Title 15, United States Code, Section 1 (Price Fixing): "1. CHI MEI OPTOELECTRONICS ("defendant") is made defendant on the charge stated below. 2. From on or about September 14,2001 to on or about December 1, 2006, defendant and its coconspirators entered into and engaged in a combination and conspiracy in the United States and elsewhere to suppress and eliminate competition by fixing the prices of thin-film transistor liquid crystal display panels ("TFT -LCD"). The combination and conspiracy engaged in by the defendant and its coconspirators was in unreasonable restraint of interstate and foreign trade and commerce in violation ofSection 1 ofthe Sherman Act (15 U.S.C. § 1). 3. The charged combination and conspiracy consisted of a continuing agreement, understanding, and concert of action among the defendant and its coconspirators, the substantial terms of which were to agree to fix the prices of TFT-LCD."	9/14/01-12/1/06		
2062	4/23/2010	Information	Information: Chu-Hsaing "James" Yang	Chi Mei	Title 15, United States Code, Section 1 (Price Fixing)	9/14/01-12/1/06		
2066	4/30/2010	Information	Information: Jau-Yang Ho	Chi Mei	Title 15, United States Code, Section 1 (Price Fixing)	9/14/01-12/1/06		
2073	7/28/2010	Information	Wen-Hung Huang Information	Chi Mei	Title 15, United States Code, Section 1 (Price Fixing)	9/14/01-12/1/06		
2076	8/4/2010	Information	Information: Chen-Lung Kuo	Chi Mei	Title 15, United States Code, Section 1 (Price Fixing)	9/14/01-12/1/06		
2061	2/17/2010	Judgment	Judgment: Chi Mei	Chi Mei	Pledaded Guilty to Violation of Title 15, United States Code, Section 1 (Price Fixing): Count One	Offense ended 12/2006		\$220 Million
2064	4/30/2010	Judgment	Judgment: Chu-Hsaing Yang	Chi Mei	Pledaded Guilty to Violation of Title 15, United States Code, Section 1 (Price Fixing): Count One	Offense ended 12/2006	270 days	\$25,000
2069	6/2/2010	Judgment	Judgment: Jau-Yang Ho	Chi Mei	Pledaded Guilty to Violation of Title 15, United States Code, Section 1 (Price Fixing): Count One	Offense ended 12/2006	14 months	\$50,000
2080	9/2/2010	Judgment	Judgment: Wen-Hung Huang	Chi Mei	Pledaded Guilty to Violation of Title 15, United States Code, Section 1 (Price Fixing): Count One	Offense ended 12/2006	270 days	\$25,000
2082	9/15/2010	Judgment	Judgment: Chen-Lung Kuo	Chi Mei	Pledaded Guilty to Violation of Title 15, United States Code, Section 1 (Price Fixing): Count One	Offense ended 12/2006	270 days	\$35,000

Exhibit No.	Date	Document Type	Document Description	Affiliated Co. / Co. Involved	U.S. District Court Information, Indictment, Plea, Verdict or Judgment Summary Details	Period	Incarceration	Fine
2059	2/2/2010	Plea Agreement	Joint Sentencing Memorandum and Plea Agreement: Chi Mei	Chi Mei	Title 15, United States Code, Section 1 (Price Fixing): "conspiracy to suppress and eliminate competition by fixing the prices of TFT-LCD sold in the United States and elsewhere, from on or about September 14, 2001, to on or about December 1, 2006 (the "relevant period"), in violation of the Sherman Antitrust Act, 15 U.S.C. § 1." "In furtherance of the conspiracy, the defendants, through their officers and employees, engaged in discussions and attended meetings, including group meetings commonly referred to by the participants as "crystal meetings," with representatives of other major TFT-LCD producers. During these discussions and meeting, agreements were reached to fix the price of TFT-LCD to be sold in the United States and elsewhere." "During the relevant period, TFT-LCD sold by the on or more of the conspirator firms, and equipment and supplies necessary to the production and distribution of TFT-LCD, as well as payments for TFT-LCD, traveled in interstate and foreign commerce." "The business activities of the defendants and their co-conspirators in connection with the production and sale of TFT-LCD that were the subjects of the conspiracy were within the flow of, and substantially affected, interstate and foreign commerce." "Acts in furtherance of this conspiracy were carried out within the Northern District of California. TFT-LCD that were the subjects of the conspiracy were sold by one or more of the conspirators to customers in this District."	9/14/01-12/1/06		\$220 Million
2063	4/28/2010	Plea Agreement	Joint Sentencing Memorandum and Plea Agreement: Chu-Hsaing "James" Yang	Chi Mei	Title 15, United States Code, Section 1 (Price Fixing); "conspiracy to suppress and eliminate competition by fixing the prices of TFT-LCD sold in the United States and elsewhere, from on or about April 1, 2004, to on or about December 1, 2006 (the "relevant period"), in violation of the Sherman Antitrust Act, 15 U.S.C. § 1."	4/1/04-12/1/06	270 days	
2067	5/24/2010	Plea Agreement	Joint Sentencing Memorandum and Plea Agreement: Jau-Yang Ho	Chi Mei	Title 15, United States Code, Section 1 (Price Fixing); "conspiracy to suppress and eliminate competition by fixing the prices of TFT-LCD sold in the United States and elsewhere, from on or about September 21, 2001, to on or about December 1, 2006 (the "relevant period"), in violation of the Sherman Antitrust Act, 15 U.S.C. § 1."	9/21/01-12/1/06	14 months	
2075	8/2/2010	Plea Agmt	Joint Sentencing Memorandum and Plea Agreement: Wen-Hung "Amigo" Huang	Chi Mei	Title 15, United States Code, Section 1 (Price Fixing); "conspiracy to suppress and eliminate competition by fixing the prices of TFT-LCD sold in the United States and elsewhere, from on or about September 14, 2001 to on or about December 1, 2006 (the "relevant period"), in violation of the Sherman Antitrust Act, 15 U.S.C. § 1."	9/14/01-12/1/06		

Exhibit No.	Date	Document Type	Document Description	Affiliated Co. / Co. Involved	U.S. District Court Information, Indictment, Plea, Verdict or Judgment Summary Details	Period	Incarceration	Fine
2079	8/30/2010	Plea Agreement	Joint Sentencing Memorandum and Plea Agreement: Chen-Lung Kuo	Chi Mei	Title 15, United States Code, Section 1 (Price Fixing); "conspiracy to suppress and eliminate competition by fixing the prices of TFT-LCD sold in the United States and elsewhere, from on or about April 1, 2004, to on or about December 1, 2006 (the "relevant period"), in violation of the Sherman Antitrust Act, 15 U.S.C. § 1."	4/1/04-12/1/06		
2060	2/8/2010	Plea Colloquy	Transcript: Chi Mei Guilty Plea	Chi Mei	Title 15, United States Code, Section 1 (Price Fixing): Admission of engaging in acts, equipment and supplies necessary to the production of tft-lcd traveled in interstate commerce, some acts were carried out within the Northern District of California, one or more products were sold to customers in the Northern District of California (30-31.)	9/14/01-12/1/06		
2065	4/30/2010	Plea Colloquy	Transcript: Chu-Hsaing Yang Guilty Plea	Chi Mei	Title 15, United States Code, Section 1 (Price Fixing): Page 12: 4/1/04-12/1/06 participation in price fixing.	4/1/04-12/1/06		
2068	6/1/2010	Plea Colloquy	Transcript: Jau-Yang Ho Guilty Plea	Chi Mei	Title 15, United States Code, Section 1 (Price Fixing); beginning 9/01 (page 14)	9/14/01-12/1/06		
2078	8/6/2010	Plea Colloquy	Transcript: Wen-Hung Huang Guilty Plea	Chi Mei	Title 15, United States Code, Section 1 (Price Fixing); beginning 9/14/01 (page 12)	9/14/01-12/1/06		
2081	9/3/2010	Plea Colloquy	Transcript: Chen-Lung Kuo Guilty Plea	Chi Mei	Title 15, United States Code, Section 1 (Price Fixing), (Page 11-12)	4/1/04-9/1/06		
2019	11/12/2008	Information	Information: Chunghwa	CPT	Title 15, United States Code, Section 1 (Price Fixing): "From on or about September 14, 2001 to on or about December 1, 2006, defendant and its coconspirators entered into and engaged in a combination and conspiracy in the United States and elsewhere to suppress and eliminate competition by fixing the prices of thin-film transistor liquid crystal display panels ("TFT -LCD"). The combination and conspiracy engaged in by the defendant and its coconspirators was in unreasonable restraint of interstate and foreign trade and commerce in violation of Section 1 of the Sherman Act (15 U.S.C. § 1). 3. The charged combination and conspiracy consisted of a continuing agreement, understanding, and concert of action among the defendant and its coconspirators, the substantial terms of which were to agree to fix the prices of TFT-LCD. ... During the period covered by this Information, CHUNGHWA PICTURE TUBES, LTD. engaged in the business of producing and selling TFTLCD to customers in the United States and elsewhere."	9/14/01-12/1/06		
2030	1/15/2009	Information	Information: Hsueh-Lung Lee, Chieng-Hon Lin, and Chih-Chun Liu	CPT	Title 15, United States Code, Section 1 (Price Fixing)	9/14/01-12/1/06		

Exhibit No.	Date	Document Type	Document Description	Affiliated Co. / Co. Involved	U.S. District Court Information, Indictment, Plea, Verdict or Judgment Summary Details	Period	Incarceration	Fine
2031	1/20/2009	Judgment	Judgment: Chunghwa	CPT	Pleaded Guilty to Violation of Title 15, United States Code, Section 1 (Price Fixing): Count One	Offense ended 12/6/06		\$65 Million
2040	2/23/2009	Judgment	Judgment: Chieng-Hon Lin	CPT	Pleaded Guilty to Violation of Title 15, United States Code, Section 1 (Price Fixing): Count One	Offense ended 12/2006	270 days	\$50,000
2043	3/9/2009	Judgment	Judgment: Chih-Chun Liu	CPT	Pleaded Guilty to Violation of Title 15, United States Code, Section 1 (Price Fixing): Count One	Offense ended 12/2006	210 days	\$30,000
2044	3/9/2009	Judgment	Judgment: Hsueh-Lung "Brian" Lee	CPT	Pleaded Guilty to Violation of Title 15, United States Code, Section 1 (Price Fixing): Count One	Offense ended 12/2006	180 days	\$20,000
2027	1/5/2009	Plea Agreement	Joint Sentencing Memorandum and Plea Agreement: Chunghwa	CPT	Title 15, United States Code, Section 1 (Price Fixing); "conspiracy to suppress and eliminate competition by fixing the prices of TFT-LCD sold in the United States and elsewhere, from on or about September 14, 2001, to on or about December 1, 2006 (the "relevant period"), in violation of the Sherman Antitrust Act, 15 U.S.C. § 1." "In furtherance of the conspiracy, the defendants, through their officers and employees, engaged in discussions and attended meetings, including group meetings commonly referred to by the participants as "crystal meetings," with representatives of other major TFT-LCD producers. During these discussions and meeting, agreements were reached to fix the price of TFT-LCD to be sold in the United States and elsewhere" "During the relevant period, TFT-LCD sold by the on or more of the conspirator firms, and equipment and supplies necessary to the production and distribution of TFT-LCD, as well as payments for TFT-LCD, traveled in interstate and foreign commerce." "The business activities of the defendant and their coconspirators in connection with the production and sale of TFT-LCD that were the subjects of the conspiracy were within the flow of, and substantially affected, interstate and foreign commerce." "Acts in furtherance of this conspiracy were carried out within the Northern District of California. TFT-LCD that were the subjects of the conspiracy were sold by one or more of the conspirators to customers in this District."	9/14/01-12/01/06		
2033	2/12/2009	Plea Agmt	Joint Sentencing Memorandum and Plea Agreement: Chieng-Hon Lin	CPT	Title 15, United States Code, Section 1 (Price Fixing); "conspiracy to suppress and eliminate competition by fixing the prices ofTFT-LCD sold in the United States and elsewhere, from on or about June 11, 2003 to on or about December 1, 2006 (the "relevant period"), in violation of the Sherman Antitrust Act, 15 U.S.C. § 1."	6/11/03-12/1/06		

Exhibit No.	Date	Document Type	Document Description	Affiliated Co. / Co. Involved	U.S. District Court Information, Indictment, Plea, Verdict or Judgment Summary Details	Period	Incarceration	Fine
2038	2/20/2009	Plea Agreement	Joint Sentencing Memorandum and Plea Agreement: Chih-Chun Liu	CPT	Title 15, United States Code, Section 1 (Price Fixing); "conspiracy to suppress and eliminate competition by fixing the prices of TFT-LCD sold in the United States and elsewhere, from on or about September 14, 2001, to on or about July 8, 2005 (the "relevant period"), in violation of the Sherman Antitrust Act, 15 U.S.C. § 1."	9/14/01-7/8/05		
2039	2/20/2009	Plea Agreement	Joint Sentencing Memorandum and Plea Agreement: Hsueh-Lung Lee	CPT	Title 15, United States Code, Section 1 (Price Fixing); "conspiracy to suppress and eliminate competition by fixing the prices of TFT-LCD sold in the United States and elsewhere, from on or about September 14, 2001, to on or about December 1, 2006 (the "relevant period"), in violation of the Sherman Antitrust Act, 15 U.S.C. § 1."	9/14/01-12/1/06		
2028	1/14/2009	Plea Colloquy	Transcript: Chunghwa Guilty Plea	CPT	Title 15, United States Code, Section 1 (Price Fixing)	9/14/01-12/1/06		
2037	2/20/2009	Plea Colloquy	Transcript: Chieng-Hon Lin Guilty Plea	CPT	Title 15, United States Code, Section 1 (Price Fixing)	6/11/03-12/1/06		
2041	2/27/2009	Plea Colloquy	Transcript: Hsueh-Lung Lee and Chih-Chun Liu Guilty Plea	CPT	Title 15, United States Code, Section 1 (Price Fixing)	9/14/01-12/1/06		
2054	8/25/2009	Information	Information: Epson	Epson	Title 15, United States Code, Section 1 (Price Fixing): "1. EPSON IMAGING DEVICES CORPORATION ("defendant") is made a defendant on the charge stated below. 2. From in or about the fall of 2005 to in or about the middle of 2006, defendant and its coconspirators entered into and engaged in a combination and conspiracy in the United States and elsewhere to suppress and eliminate competition by fixing the prices of thin-film transistor liquid crystal display panels ("TFT-LCD") sold to Motorola Inc. ("Motorola") for use in Razr mobile phones. The combination and conspiracy engaged in by the defendant and its coconspirators was in unreasonable restraint of interstate and foreign trade and commerce in violation of Section I of the Sherman Act (15 U.S.C. § 1). 3. The charged combination and conspiracy consisted of a continuing agreement, understanding, and concert of action among the defendant and its coconspirators, the substantial terms of which were to agree to fix the prices of TFT-LCD to be sold to Motorola for use in Razr mobile phones."	Fall 2005-Middle 2006		
2057	10/26/2009	Judgment	Judgment: Epson	Epson	Pleaded Guilty to Violation of Title 15, United States Code, Section 1 (Price Fixing): Count One	Approximately 6/2006		\$26 Million

Exhibit No.	Date	Document Type	Document Description	Affiliated Co. / Co. Involved	U.S. District Court Information, Indictment, Plea, Verdict or Judgment Summary Details	Period	Incarceration	Fine
2055	10/9/2009	Plea Agreement	Joint Sentencing Memorandum and Plea Agreement: Epson	Epson	Title 15, United States Code, Section 1 (Price Fixing); "conspiracy to suppress and eliminate competition by fixing the prices of TFT-LCD sold to Motorola for use in Razr mobile phones, from the fall of 2005 to the middle of 2006 ("the relevant period") in violation of the Sherman Antitrust Act, 15 U.S.C. § 1. During the relevant period EID engaged in the sale of small-sized TFT-LCD in the United States and elsewhere and employed between 1,000 and 5,000 employees" " In furtherance of the conspiracy, the defendants, through their officers and employees, engaged in bilateral telephone discussions, and attended bilateral meetings in Japan with representatives of other major TFT-LCD producers. During these discussions and meeting, agreements were reached to fix the price of TFT-LCD sold to Motorola for use in Razr mobile phones." "During the relevant period, TFT-LCD sold by the on or more of the conspirator firms, and equipment and supplies necessary to the production and distribution of TFT-LCD, as well as payments for TFT-LCD, traveled in interstate and foreign commerce." "The business activities of the defendnat and its cocospirators in connection with the production and sale of TFT-LCD that were the subjects of the conspiracy were withinn the flow of, and substantially affected, interstate and foreign commerce." "Acts in furtherance of this conspiracy were carried out within the Northern District of California. TFT-LCD that were the subjects of the conspiracy were sold by one or more of the conspirators to customers in this District."	Fall 2005- Middle 2006		
2056	10/16/2009	Plea Colloquy	Transcript: Epson Guilty Plea	Epson	Title 15, United States Code, Section 1 (Price Fixing)	Fall 2005- Middle 2006		
2071	6/29/2010	Information	Information: HannStar	HannStar	Title 15, United States Code, Section 1 (Price Fixing): "1. HANNSTAR DISPLAY CORPORATION ("defendant") is made the defendant on the charge stated below. 2. From on or about September 14, 200 I to on or about January 31, 2006, the defendant and its coconspirators entered into and engaged in a combination and conspiracy in the United States and elsewhere to suppress and eliminate competition by fixing the prices of thin-film transistor liquid crystal display panels ("TFT-LCD"). The combination and conspiracy engaged in by the defendant and its coconspirators was in unreasonable restraint of interstate and foreign trade and commerce in violation of Section I of the Sherman Act (15 U .S.C. § I). 3. The charged combination and conspiracy consisted of a continuing agreement, understanding, and concert of action among the defendant and its coconspirators, the substantial terms of which were to agree to fix the prices of TFT-LCD."	9/14/01- 1/31/06		
2083	10/27/2010	Information	Information: Jui Hung Wu	HannStar	Title 15, United States Code, Section 1 (Price Fixing)	9/14/01- 1/31/06		

Exhibit No.	Date	Document Type	Document Description	Affiliated Co. / Co. Involved	U.S. District Court Information, Indictment, Plea, Verdict or Judgment Summary Details	Period	Incarceration	Fine
2077	8/6/2010	Judgment	Judgment: HannStar	HannStar	Pleaded Guilty to Violation of Title 15, United States Code, Section 1 (Price Fixing): Count One	Offense ended 1/31/06		\$30 Million
2085	11/12/2010	Judgment	Judgment: Jui Hung Wu	HannStar	Pleaded Guilty to Violation of Title 15, United States Code, Section 1 (Price Fixing): Count One	Offense ended 1/31/06	210 days	\$20,000
2072	7/22/2010	Plea Agreement	Joint Sentencing Memorandum and Plea Agreement: HannStar	HannStar	Title 15, United States Code, Section 1 (Price Fixing); "conspiracy to suppress and eliminate competition by fixing the prices ofTFT-LCD sold in the United States and elsewhere, from on or about September 14, 2001, to on or about January 31, 2006 (the "relevant period"), in violation of the Sherman Antitrust Act, 15 U.S.C. § 1." "In furtherance of the conspiracy, the defendants, through their officers and employees, engaged in discussions and attended meetings, including group meetings commonly referred to by the partipants as "crystal meetings," with representatives of other major TFT-LCD producers. During these discussions and meeting, agreements were reached to fix the price of TFT-LCD to be sold in the United States and elsewhere." "During the relevant period, TFT-LCD sold by the on or more of the conspirator firms, and equipment and supplies necessary to the production and distribution of TFT-LCD, as well as payments for TFT-LCD, traveled in interstate and foreign commerce. Certain business activities of the defendant and their co-conspirators in connection with the production and sale of TFT-LCD that were the subjects of the conspiracy were within the flow of, and substantially affected, interstate and foreign commerce." "Acts in furtherance of this conspiracy were carried out within the Northern District of California. TFT-LCD that were the subjects of the conspiracy were sold by one or more of the conspirators to customers in this District."	9/14/01-1/31/06		
2084	11/9/2010	Plea Agreement	Joint Sentencing Memorandum and Plea Agreement: Jui Hung Wu	HannStar	Title 15, United States Code, Section 1 (Price Fixing); "conspiracy to suppress and eliminate competition by fixing the prices ofTFT-LCD sold in the United States and elsewhere, from on or about September 21, 2001, to on or about January 31, 2006 (the "relevant period"), in violation of the Sherman Antitrust Act, 15 U.S.C. § 1."	9/21/01-1/31/06		
2074	7/30/2010	Plea Colloquy	Transcript: HannStar Guilty Plea	HannStar	Title 15, United States Code, Section 1 (Price Fixing) (Page 16)	9/14/01-1/31/06		
2086	11/12/2010	Plea Colloquy	Transcript: Jui Hung Wu Guilty Plea	HannStar	Title 15, United States Code, Section 1 (Price Fixing)	9/21/01-1/31/06		

Exhibit No.	Date	Document Type	Document Description	Affiliated Co. / Co. Involved	U.S. District Court Information, Indictment, Plea, Verdict or Judgment Summary Details	Period	Incarceration	Fine
2046	3/31/2009	Indictment	Indictment: Sakae Someya	Hitachi	Title 15, United States Code, Section 1 (Price Fixing): "1. SAKAE SOMEYA is hereby indicted and made a defendant on the charge stated below: 2. From on or about January 1, 2001, until on or about December 31, 2004, the exact dates being unknown to the Grand Jury, the defendant, SAKAE SOMEY A, coconspirator Hitachi Displays Ltd. ("Hitachi"), and other corporations and individuals, entered into and engaged in a combination and conspiracy to suppress and eliminate competition by fixing the prices of thin-film transistor liquid crystal display panels ("TFT-LCD") sold to Dell Inc. or its subsidiaries ("Dell") for use in desktop monitors and notebook computers. The combination and conspiracy engaged in by the defendant, his corporate employer, and other coconspirators was in unreasonable restraint of interstate and foreign trade and commerce in violation of Section 1 of the Sherman Act (15 U.S.C. § 1). 3. Defendant SAKAE SOMEYA joined and participated in the conspiracy from as early as January 1, 2001 and continued until at least December 31, 2004."	1/1/01-12/31/04		
2045	3/10/2009	Information	Information: Hitachi	Hitachi	Title 15, United States Code, Section 1 (Price Fixing): "2. From on or about April 1, 2001 to on or about March 31, 2004, defendant and its coconspirators entered into and engaged in a combination and conspiracy in the United States and elsewhere to suppress and eliminate competition by fixing the prices of thin-film transistor liquid crystal display panels ("TFT LCD") sold to Dell Inc. or its subsidiaries ("Dell") for use in desktop monitors and notebook computers. The combination and conspiracy engaged in by the defendant and its coconspirators was in unreasonable restraint of interstate and foreign trade and commerce in violation of Section 1 of the Sherman Act (15 U.S.C. § 1). 3. The charged combination and conspiracy consisted of a continuing agreement, understanding, and concert of action among the defendant and its coconspirators, the substantial terms of which were to agree to fix the prices of TFT-LCD to be sold to Dell. 4. For the purpose of forming and carrying out the charged combination and conspiracy, the defendant and its coconspirators did those things that they combined and conspired to do, including, among other things: (a) participating in bilateral meetings, conversations, and communications in Japan, Korea, and the United States to discuss the prices of TFT-LCD to be sold to Dell; (b) agreeing, during those bilateral meetings, conversations, and communications, to charge prices of TFT-LCD to be sold to Dell at certain predetermined levels; (c) issuing price quotations in accordance with the agreements reached; and (d) exchanging information on sales of TFT-LCD sold to Dell, for the purpose of monitoring and enforcing adherence to the agreed-upon prices."	4/1/01-3/31/04		

Exhibit No.	Date	Document Type	Document Description	Affiliated Co. / Co. Involved	U.S. District Court Information, Indictment, Plea, Verdict or Judgment Summary Details	Period	Incarceration	Fine
2050	6/4/2009	Judgment	Judgment: Hitachi	Hitachi	Pleaded Guilty to Violation of Title 15, United States Code, Section 1 (Price Fixing): Count One	Offense ended 3/2004		\$31 Million
2048	5/17/2009	Plea Agreement	Joint Sentencing Memorandum and Plea Agreement: Hitachi	Hitachi	Title 15, United States Code, Section 1 (Price Fixing); "conspiracy to suppress and eliminate competition by fixing the prices of TFT-LCD sold to Dell for use in notebook computers, from on or about April 1, 2001 to on or about March 31, 2004 in violation of the Sherman Antitrust Act, 15 U.S.C. § 1. During the relevant period, Hitachi was engaged in the sale of TFT-LCD for use in notebook computers in the United States and elsewhere and employed between 1,000 and 5,000 employees." "In furtherance of the conspiracy, the defendants, through their officers and employees, engaged in telephone discussions, and attended bilateral meetings with representatives of other major TFT-LCD producers." "During the relevant period, TFT-LCD sold by the on or more of the conspirator firms, and equipment and supplies necessary to the production and distribution of TFT-LCD, as well as payments for TFT-LCD, traveled in interstate and foreign commerce." "Acts in furtherance of this conspiracy were carried out within the Northern District of California. TFT-LCD that were the subjects of the conspiracy were sold by one or more of the conspirators to customers in this District."	4/1/01-3/31/04		
2049	5/22/2009	Plea Transcript	Colloquy : Hitachi Guilty Plea	Hitachi	Title 15, United States Code, Section 1 (Price Fixing)	4/1/01-3/31/04		
2020	11/12/2008	Information	Information: LG	LG	Title 15, United States Code, Section 1 (Price Fixing): "2. From on or about September 21, 2001 to on or about June 1, 2006, the defendants and their coconspirators entered into and engaged in a combination and conspiracy in the United States and elsewhere to suppress and eliminate competition by fixing the prices of thin-film transistor liquid crystal display panels ("TFT-LCD"). The combination and conspiracy engaged in by the defendants and their coconspirators was in unreasonable restraint of interstate and foreign trade and commerce in violation of Section 1 of the Sherman Act (15 U.S.C. § 1). 3. The charged combination and conspiracy consisted of a continuing agreement, understanding, and concert of action among the defendants and their coconspirators, the substantial terms of which were to agree to fix the prices of TFT-LCD."	9/21/01-6/1/06		
2029	1/15/2009	Information	Information: Chang Suk Chung	LG	Title 15, United States Code, Section 1 (Price Fixing)	9/21/01-6/1/06		

Exhibit No.	Date	Document Type	Document Description	Affiliated Co. / Co. Involved	U.S. District Court Information, Indictment, Plea, Verdict or Judgment Summary Details	Period	Incarceration	Fine
2047	4/27/2009	Information	Information: Bock Kwon	LG	Title 15, United States Code, Section 1 (Price Fixing): "1. BOCK KWON ("defendant") is made a defendant on the charge stated below. 2. From on or about September 21, 2001, until on or about June 1, 2006, the defendant's corporate employer, LG Display Co., Ltd. (formerly LG.Philips LCD Co., Ltd.) ("LG"), and coconspirators entered into and engaged in a combination and conspiracy in the United States and elsewhere to suppress and eliminate competition by fixing the prices of thin-film transistor liquid crystal display panels ("TFT-LCD"). The combination and conspiracy engaged in by the defendant's corporate employer and coconspirators was an unreasonable restraint of interstate and foreign trade and commerce in violation of Section 1 of the Sherman Act (15 U.S.C. § 1). The defendant knowingly joined and participated in the charged conspiracy from on or about September 21, 2001, until on or about June 1, 2006. 3. The charged combination and conspiracy consisted of a continuing agreement, understanding, and concert of action among the defendant, his corporate employer, and coconspirators, the substantial terms of which were to agree to fix the prices of TFT-LCD."	12/21/01-6/1/06		
2035	2/18/2009	Judgment	Judgment: Chang Suk Chung	LG	Pleaded Guilty to Violation of Title 15, United States Code, Section 1 (Price Fixing): Count One	Offense ended 6/1/06	7 months	\$25,000
2042	3/6/2009	Judgment	Judgment: LG	LG	Pleaded Guilty to Violation of Title 15, United States Code, Section 1 (Price Fixing): Count One	Offense ended 6/1/06		\$400 Million
2053	6/29/2009	Judgment	Judgment: Bock Kwon	LG	Pleaded Guilty to Violation of Title 15, United States Code, Section 1 (Price Fixing): Count One	Offense ended 6/2006	12 months 1 day	\$30,000

Exhibit No.	Date	Document Type	Document Description	Affiliated Co. / Co. Involved	U.S. District Court Information, Indictment, Plea, Verdict or Judgment Summary Details	Period	Incarceration	Fine
2022	12/8/2008	Plea Agreement	Joint Sentencing Memorandum and Plea Agreement: LG	LG	Title 15, United States Code, Section 1 (Price Fixing); "conspiracy to suppress and eliminate competition by fixing the prices of TFT-LCD sold in the United States and elsewhere, from on or about September 21, 2001, to on or about June 1, 2006 (the "relevant period"), in violation of the Sherman Antitrust Act, 15 U.S.C. § 1." "In furtherance of the conspiracy, the defendants, through their officers and employees, engaged in discussions and attended meetings, including group meetings commonly referred to by the participants as 'crystal meetings,' with representatives of other major TFT-LCD producers. During these discussions and meeting, agreements were reached to fix the price of TFT-LCD to be sold in the United States and elsewhere." "During the relevant period, TFT-LCD sold by the on or more of the conspirator firms, and equipment and supplies necessary to the production and distribution of TFT-LCD, as well as payments for TFT-LCD, traveled in interstate and foreign commerce." "The business activities of the defendants and their co-conspirators in connection with the production and sale of TFT-LCD that were the subjects of the conspiracy were within the flow of, and substantially affected, interstate and foreign commerce." "Acts in furtherance of this conspiracy were carried out within the Northern District of California. TFT-LCD that were the subjects of the conspiracy were sold by one or more of the conspirators to customers in this District."	9/21/01-6/21/06		
2036	2/20/2009	Plea Agreement	Joint Sentencing Memorandum and Plea Agreement: Chang Suk Chung	LG	Title 15, United States Code, Section 1 (Price Fixing); "conspiracy to suppress and eliminate competition by fixing the prices of TFT-LCD sold in the United States and elsewhere, from on or about September 21, 2001, to on or about December 1, 2006 (the "relevant period"), in violation of the Sherman Antitrust Act, 15 U.S.C. § 1."	9/21/01-6/1/06		
2051	6/18/2009	Plea Agreement	Joint Sentencing Memorandum and Plea Agreement: Bock Kwon	LG	Title 15, United States Code, Section 1 (Price Fixing); "conspiracy to suppress and eliminate competition by fixing the prices of TFT-LCD sold in the United States and elsewhere, from on or about September 21, 2001, to on or about June 1, 2006 (the "relevant period"), in violation of the Sherman Antitrust Act, 15 U.S.C. § 1."	9/21/01-6/1/06		
2024	12/15/2008	Plea Colloquy	Transcript: LG Guilty Plea	LG	Title 15, United States Code, Section 1 (Price Fixing)	9/21/01 to 6/1/06		
2034	2/17/2009	Plea Colloquy	Transcript: Chang Suk Chung Guilty Plea	LG	Title 15, United States Code, Section 1 (Price Fixing): see 2034-0018	9/21/01-6/1/06		
2052	6/24/2009	Plea Colloquy	Transcript: Bock Kwon Guilty Plea	LG	Title 15, United States Code, Section 1 (Price Fixing)	9/21/01-6/1/06		

Exhibit No.	Date	Document Type	Document Description	Affiliated Co. / Co. Involved	U.S. District Court Information, Indictment, Plea, Verdict or Judgment Summary Details	Period	Incarceration	Fine
2021	11/12/2008	Information	Information: Sharp	Sharp	Title 15, United States Code, Section 1 (Price Fixing): "2. From on or about April 1, 2001 to on or about December 1, 2006, defendant and its coconspirators entered into and engaged in a combination and conspiracy in the United States and elsewhere to suppress and eliminate competition by fixing the prices of thin-film transistor liquid crystal display panels ("TFT-LCD") sold to Dell Inc. ("Dell") for use in computer monitors and laptops. The combination and conspiracy engaged in by the defendant and its coconspirators was in unreasonable restraint of interstate and foreign trade and commerce in violation of Section 1 of the Sherman Act (15 U.S. C. § 1). 3. The charged combination and conspiracy consisted of a continuing agreement, understanding, and concert of action among the defendant and its coconspirators, the substantial terms of which were to agree to fix the prices of TFT -LCD to be sold to Dell." COUNT 2: "13. From on or about September 1, 2005 to on or about December 1, 2006, defendant and its coconspirators entered into and engaged in a combination and conspiracy in the United States and elsewhere to suppress and eliminate competition by fixing the prices of TFT-LCD sold to Apple Computer Inc. ("Apple") for use in iPod portable music players. The combination and conspiracy engaged in by the defendant and its coconspirators was in unreasonable restraint of interstate and foreign trade and commerce in violation of Section 1 of the Sherman Act (15 U.S.C. § 1)." COUNT 3: "From in or about the fall of 2005 to in or about the middle of 2006, defendant and its coconspirators entered into and engaged in a combination and conspiracy in the United States and elsewhere to suppress and eliminate competition by fixing the prices of TFT-LCD sold to Motorola Inc. ("Motorola") for use in Razr mobile phones. The combination and conspiracy engaged in by the defendant and its coconspirators was in unreasonable restraint of interstate and foreign trade and commerce in violation of Section 1 of the Sherman Act (15 U.S.C. § 1)."	4/1/01-12/1/06		
2026	12/19/2008	Judgment	Judgment: Sharp	Sharp	Pleaded Guilty to Violation of Title 15, United States Code, Section 1 (Price Fixing): Counts One, Two and Three	Offense ended 12/6/06		\$120 Million

Exhibit No.	Date	Document Type	Document Description	Affiliated Co. / Co. Involved	U.S. District Court Information, Indictment, Plea, Verdict or Judgment Summary Details	Period	Incarceration	Fine
2023	12/8/2008	Plea Agreement	Joint Sentencing Memorandum and Plea Agreement: Sharp	Sharp	Title 15, United States Code, Section 1 (Price Fixing); "conspiracy to suppress and eliminate competition by fixing the prices of TFT-LCD sold in the United States and elsewhere"....."in violation of the Sherman Anitrust Act, 15 U.S.C. § 1." Sharp pleaded guilty to a three-count information which included conspiracy counts to suppress and eliminate competition by fixing the prices of TFT-LCD sold to Dell for use computer monitors and laptops, from on or about April 1, 2001 to on or about December 1, 2006; to suppress and eliminate competition by fixing the prices of TFT-LCD sold to Apple for use in iPod portable music players, from on or about September 1, 2005 to on or about December 1, 2006; and eliminate competition by fixing the prices of TFT-LCD sold to Motorola for use in Razr mobile phones, from the fall of 2005 to the middle of 2006. "In furtherance of the conspiracy, the defendants, through their officers and employees, engaged in bilateral telephone discussions, and attended bilateral meetings with representatives of other major TFT-LCD producers. During these discussions and meeting, agreements were reached to fix the price of TFT-LCD' to be sold to Dell, Apple and Motorola." "During the relevant period, TFT-LCD sold by the one or more of the conspirator firms, and equipment and supplies necessary to the production and distribution of TFT-LCD, as well as payments for TFT-LCD, traveled in interstate and foreign commerce."	4/1/01 - 12/1/06		
2025	12/16/2008	Plea Colloquy	Transcript: Sharp Guilty Plea	Sharp	Title 15, United States Code, Section 1 (Price Fixing)	4/1/01-12/1/06		

EXHIBIT B

**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA
(SAN FRANCISCO DIVISION)**

IN RE: TFT-LCD (FLAT PANEL)
ANTITRUST LITIGATION

MASTER CASE NO. 3:07-md-1827 SI, MQ
MDL NO. 1827

This Documents Relates To:

Best Buy v. AU Optronics Corp. et al,
Case No. 10-CV-4572,

Best Buy v. Toshiba Corp. et al
Case No. 12-CV-4114

*Eastman Kodak Company v. Epson Imaging
Devices Corp. et al.*, Case No. 10-CV-5452

Individual Cases:

CASE NO. 10-CV-4572

CASE NO. 10-CV-5452

CASE NO. 10-CV-4945

CASE NO. 12-CV-4114

CERTIFICATION OF AUTHENTICITY

I, Shinobu Obata, declare as follows:

1. I currently hold the position of General Manager in the Legal Division of NEC Corporation. Except for those matters on information and belief, which I believe to be true, I have personal knowledge of the facts set forth herein, and if called as a witness, I could and would competently testify thereto.

2. Attached hereto as Attachment A is a list of business records (identified by document name) prepared and/or maintained by NEC Corporation ("the Records").

3. I am qualified to attest to the manner and process by which these Records are created and maintained by virtue of my duties and responsibilities as General Manager in the Legal Division of NEC Corporation.

4. The Records are true and correct duplicate copies of original business records prepared and/or maintained by NEC Corporation.

5. The Records were made at or near the time of the occurrences of the matters set forth by, or from information transmitted by, someone with knowledge of those matters.

6. The Records were kept in the course of a regularly conducted business activity.

CERTIFICATION OF AUTHENTICITY

Master File No. M07-1827 SI

Individual Files 10-CV-4572; 10-CV-5452; 10-CV-4945; 12-CV-4114

1

UNITED STATES DISTRICT COURT,
NORTHERN DISTRICT OF CALIFORNIA
MDL No. 3:07-md-1827-SI

2013 Exhibit 2828

I declare under penalty of perjury and criminal penalty under the laws of the United States of America that the foregoing is true and correct. Executed this 22nd day of July 2013.


Shinobu Obata

Master File No. M07-1827 SI
Individual Files 10-CV-4572; 10-CV-5452; 10-CV-4945; 12-CV-4114

ATTACHMENT A

- 1
2 I. Press Release, Name Determined for New Joint Venture Company in the Small and Midsized
3 Liquid Crystal Panel Business, April 18, 2011, available at
4 <http://www.nec.co.jp/press/en/1104/1801.html>.
- 5
6 2. Press Release, The NEC Group and AVIC International Group Agree to a Capital Alliance to
7 Strengthen the Small and Midsized Liquid Crystal Panel Business, February 25, 2011,
8 available at <http://www.nec.co.jp/press/en/1102/2502.html>.
- 9
10 3. Press Release, NEC Establishes New LCD Company to Develop Core LCD Technologies and
11 Customized Products for the Industrial and High-End Monitor Markets, January 30, 2003,
12 available at <http://www.nec.co.jp/press/en/0301/3002.html>.
- 13
14 4. Press Release, NEC Establishes Specialist LCD Company to Develop Core LCD
15 Technologies and Customized Products for the Industrial and High-End Monitor Markets,
16 March 31, 2003, available at <http://www.nec.co.jp/press/en/0303/3102.html>.
- 17
18
19
20
21
22
23
24
25
26
27
28

CERTIFICATION OF AUTHENTICITY

Master File No. M07-1827 SI

Individual Files 10-CV-4572; 10-CV-5452; 10-CV-4945; 12-CV-4114

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

CERTIFICATION OF AUTHENTICITY

Master File No. M07-1827 SI

Individual Files 10-CV-4572; 10-CV-5452; 10-CV-4945; 12-CV-4114

4

2828-0004

**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA
(SAN FRANCISCO DIVISION)**

IN RE: TFT-LCD (FLAT PANEL)
ANTITRUST LITIGATION

MASTER CASE NO. 3:07-md-1827 SI, MQ
MDL NO. 1827

This Documents Relates To:

Best Buy v. AU Optronics Corp. et al.,
Case No. 10-CV-4572,

Best Buy v. Toshiba Corp. et al.
Case No. 12-CV-4114

*Eastman Kodak Company v. Epson Imaging
Devices Corp. et al.*, Case No. 10-CV-5452

Target Corp., et. al., v. AU Optronics Corp. et al.,
Case No. 10-CV-4945

Individual Cases:

CASE NO. 10-CV-4572

CASE NO. 10-CV-5452

CASE NO. 10-CV-4945

CASE NO. 12-CV-4114

CERTIFICATION OF AUTHENTICITY

I, Christoph Wolfgruber, declare as follows:

1. I am Group Chief Accountant, Financial Reporting, for Philips International B.V., a subsidiary of Koninklijke Philips N.V. ("Philips") (formerly known as Koninklijke Philips Electronics N.V.), and have held this position for one year. I have been employed by Philips International B.V. and its affiliates for 29 years. I have personal knowledge of the facts set forth herein, and if called as a witness, I could and would competently testify thereto.

2. Attached hereto as Attachment A is a list identifying business records prepared and/or maintained by Philips ("the Records").

3. I am the custodian of the Records, or am otherwise qualified to attest to the manner and process by which these Records are created and maintained by virtue of my duties and responsibilities as Group Chief Accountant, Financial Reporting at Philips International BV.

4. The Records are true and correct duplicate copies of original business records prepared and/or maintained by Philips.

CERTIFICATION OF AUTHENTICITY

Master File No. M07-1827 SI

Individual Files 10-CV-4572; 10-CV-5452; 10-CV-4945; 12-CV-4114

1

UNITED STATES DISTRICT COURT,
NORTHERN DISTRICT OF CALIFORNIA
MDL No. 3:07-md-1827-SI

2013 Exhibit 2829

ATTACHMENT A

1
2 LG Electronics Inc. / Koninklijke Philips Electronics N.V. Joint Venture Agreement
3 LG Electronics Inc. / Koninklijke Philips Electronics N.V. Shareholders Agreement
4 Koninklijke Philips Electronics N.V. Form 20-F for the Fiscal Year Ended December 31, 2000
5 Exhibit 8 to Koninklijke Philips Electronics N.V. Form 20-F for the Fiscal Year Ended December
6 31, 2000, "List of Significant Subsidiaries"
7 Koninklijke Philips Electronics N.V. Form 20-F for the Fiscal Year Ended December 31, 2001
8 Exhibit 8 to Koninklijke Philips Electronics N.V. Form 20-F for the Fiscal Year Ended December
9 31, 2001, "List of Significant Subsidiaries"
10 Koninklijke Philips Electronics N.V. Form 20-F for the Fiscal Year Ended December 31, 2002
11 Exhibit 8 to Koninklijke Philips Electronics N.V. Form 20-F for the Fiscal Year Ended December
12 31, 2002, "List of Significant Subsidiaries"
13 Koninklijke Philips Electronics N.V. Form 20-F for the Fiscal Year Ended December 31, 2003
14 Exhibit 8 to Koninklijke Philips Electronics N.V. Form 20-F for the Fiscal Year Ended December
15 31, 2003, "List of Significant Subsidiaries"
16 Koninklijke Philips Electronics N.V. Form 20-F for the Fiscal Year Ended December 31, 2004
17 Exhibit 8 to Koninklijke Philips Electronics N.V. Form 20-F for the Fiscal Year Ended December
18 31, 2004, "List of Significant Subsidiaries"
19 Koninklijke Philips Electronics N.V. Form 20-F for the Fiscal Year Ended December 31, 2005
20 Exhibit 8 to Koninklijke Philips Electronics N.V. Form 20-F for the Fiscal Year Ended December
21 31, 2005, "List of Significant Subsidiaries"
22 Koninklijke Philips Electronics N.V. Form 20-F for the Fiscal Year Ended December 31, 2006
23 Exhibit 8 to Koninklijke Philips Electronics N.V. Form 20-F for the Fiscal Year Ended December
24 31, 2006, "List of Significant Subsidiaries"
25 Koninklijke Philips Electronics N.V. Form 20-F for the Fiscal Year Ended December 31, 2007
26 Exhibit 8 to Koninklijke Philips Electronics N.V. Form 20-F for the Fiscal Year Ended December
27 31, 2007, "List of Significant Subsidiaries"
28 Koninklijke Philips Electronics N.V. Form 20-F for the Fiscal Year Ended December 31, 2008
Exhibit 8 to Koninklijke Philips Electronics N.V. Form 20-F for the Fiscal Year Ended December 31
, 2008, "List of Significant Subsidiaries"
Philips Annual Report 2001
Philips Annual Report 2002

1 Philips Annual Report 2003

2 Philips Annual Report 2004

3 Philips Annual Report 2005

4 Philips Annual Report 2006

5 Philips Annual Report 2007

6 Philips Annual Report 2008

7 Press Release, Philips reclassifies its Mobile Display Systems Activities under 'Other Activities,'
dated April 15, 2005 available at
8 [http://www.newscenter.philips.com/main/standard/about/news/press/archive/2005/
article-14962.wpd](http://www.newscenter.philips.com/main/standard/about/news/press/archive/2005/article-14962.wpd).

9 Press Release, Philips' breakthrough polyled technology makes its debut in new James Bond film,
10 Dated December 18, 2002,
available at [http://www.newscenter.philips.com/main/standard/about/news/press/archive/2002/
11 article-2642.wpd](http://www.newscenter.philips.com/main/standard/about/news/press/archive/2002/article-2642.wpd).

**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA
(SAN FRANCISCO DIVISION)**

IN RE: TFT-LCD (FLAT PANEL)
ANTITRUST LITIGATION

MASTER CASE NO. 3:07-md-1827 SI, MQ
MDL NO. 1827

This Documents Relates To:

Best Buy v. AU Optronics Corp. et al,
Case No. 10-CV-4572,

Best Buy v. Toshiba Corp. et al
Case No. 12-CV-4114

*Eastman Kodak Company v. Epson Imaging
Devices Corp. et al.*, Case No. 10-CV-5452

Target Corp., et al., v. AU Optronics Corp. et al.,
Case No. 10-CV-4945

Individual Cases:

CASE NO. 10-CV-4572

CASE NO. 10-CV-5452

CASE NO. 10-CV-4945

CASE NO. 12-CV-4114

CERTIFICATION OF AUTHENTICITY

I, Hirohisa Ikutomi, declare as follows:

1. I am Manager of IR Disclosure Team, Global Finance Administration Center for Panasonic Corporation ("Panasonic"), and have held this position for half a year. I have personal knowledge of the facts set forth herein, and if called as a witness, I could and would competently testify thereto.

2. Attached hereto as Attachment A is a list identifying business records prepared and/or maintained by Panasonic ("the Records").

3. I am the custodian of the Records, or am otherwise qualified to attest to the manner and process by which these Records are created and maintained by virtue of my duties and responsibilities as a Manager at Panasonic.

4. The Records are true and correct duplicate copies of original business records prepared and/or maintained by Panasonic.

5. The Records were made at or near the time of the occurrences of the matters set forth by, or from information transmitted by, someone with knowledge of those matters.

CERTIFICATION OF AUTHENTICITY

Master File No. M07-1827 SI

Individual Files 10-CV-4572; 10-CV-5452; 10-CV-4945; 12-CV-4114

1

UNITED STATES DISTRICT COURT,
NORTHERN DISTRICT OF CALIFORNIA
MDL No. 3:07-md-1827-SI

2013 Exhibit 2832

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

6. The Records were kept in the course of a regularly conducted business activity.

7. The Records were made as a regular practice of that business activity.

I declare under penalty of perjury and criminal penalty under the laws of the United States of America that the foregoing is true and correct. Executed this 23 day of July 2013 at Osaka.


Hirohisa Ikutomi

CERTIFICATION OF AUTHENTICITY

Master File No. M07-1827 SI
Individual Files 10-CV-4572; 10-CV-5452; 10-CV-4945; 12-CV-4114

ATTACHMENT A

Matsushita Electric Industrial Co., Ltd. form 20-F for the fiscal year ended March 31, 2002
Matsushita Electric Industrial Co., Ltd. form 20-F for the fiscal year ended March 31, 2003
Matsushita Electric Industrial Co., Ltd. form 20-F for the fiscal year ended March 31, 2004
Matsushita Electric Industrial Co., Ltd. form 20-F for the fiscal year ended March 31, 2005
Matsushita Electric Industrial Co., Ltd. form 20-F for the fiscal year ended March 31, 2006
Matsushita Electric Industrial Co., Ltd. form 20-F for the fiscal year ended March 31, 2007
Matsushita Electric Industrial Co., Ltd. form 20-F for the fiscal year ended March 31, 2008
Panasonic Corporation form 20-F for the fiscal year ended March 31, 2009
Panasonic Corporation form 20-F for the fiscal year ended March 31, 2010
Panasonic Corporation form 20-F for the fiscal year ended March 31, 2011
Panasonic Corporation form 20-F for the fiscal year ended March 31, 2012

CERTIFICATION OF AUTHENTICITY

Master File No. M07-1827 SI

Individual Files 10-CV-4572; 10-CV-5452; 10-CV-4945; 12-CV-4114

**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA
(SAN FRANCISCO DIVISION)**

IN RE: TFT-LCD (FLAT PANEL)
ANTITRUST LITIGATION

MASTER CASE NO. 3:07-md-1827 SI, MQ
MDL NO. 1827

This Documents Relates To:

Best Buy v. AU Optronics Corp. et al,
Case No. 10-CV-4572,

Best Buy v. Toshiba Corp. et al
Case No. 12-CV-4114

*Eastman Kodak Company v. Epson Imaging
Devices Corp. et al.*, Case No. 10-CV-5452

Target Corp., et al., v. AU Optronics Corp. et al.,
Case No. 10-CV-4945

Individual Cases:

CASE NO. 10-CV-4572

CASE NO. 10-CV-5452

CASE NO. 10-CV-4945

CASE NO. 12-CV-4114

CERTIFICATION OF AUTHENTICITY

I, Hirohisa Ikutomi, declare as follows:

1. I am Manager of IR Disclosure Team, Global Finance Administration Center for Panasonic Corporation ("Panasonic"), and have held this position for half a year. I have personal knowledge of the facts set forth herein, and if called as a witness, I could and would competently testify thereto.

2. Attached hereto as Attachment A is a list identifying certain documents prepared and/or maintained by Panasonic ("the Documents").

3. I am the custodian of the Documents, or am otherwise qualified to attest to the manner and process by which these Documents are created and maintained by virtue of my duties and responsibilities as a Manager at Panasonic.

4. The Documents are true and correct duplicate copies of original documents prepared and/or maintained by Panasonic.

5. The Documents were made at or near the time of the occurrences of the matters set forth by, or from information transmitted by, someone with knowledge of those matters.

CERTIFICATION OF AUTHENTICITY

Master File No. M07-1827 SI

Individual Files 10-CV-4572; 10-CV-5452; 10-CV-4945; 12-CV-4114

UNITED STATES DISTRICT COURT,
NORTHERN DISTRICT OF CALIFORNIA
MDL No. 3:07-md-1827-SI

2013 Exhibit 2830

1
2 I declare under penalty of perjury and criminal penalty under the laws of the United States of
3 America that the foregoing is true and correct. Executed this 23 day of July 2013 at Osaka.
4

5 H. Ikutomi
6 Hirohisa Ikutomi
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

CERTIFICATION OF AUTHENTICITY

Master File No. M07-1827 SI

Individual Files 10-CV-4572; 10-CV-5452; 10-CV-4945; 12-CV-4114

2

ATTACHMENT A

1. Press Release. Hitachi, Toshiba and Matsushita Conclude Agreement for Establishment of TVLCD Panel Joint Venture, IPS Alpha Technology, October 29, 2004
2. Press Release. Conclusion of Formal Contract Between Hitachi and Matsushita Related to Comprehensive LCD Panel Business Alliance, February 15, 2008
3. Press Release. Panasonic to Change Company Name of Subsidiary (IPS Alpha Technology), August 23, 2010,
4. Press Release. Matsushita Announces Proposed Senior Management Changes

CERTIFICATION OF AUTHENTICITY

Master File No. M07-1827 SI

Individual Files 10-CV-4572; 10-CV-5452; 10-CV-4945; 12-CV-4114

UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA
(SAN FRANCISCO DIVISION)

IN RE: TFT-LCD (FLAT PANEL)
ANTITRUST LITIGATION

MASTER CASE NO. 3:07-md-1827 SI, MQ
MDL NO. 1827

This Documents Relates To:

Best Buy v. AU Optronics Corp. et al,
Case No. 10-CV-4572,

Best Buy v. Toshiba Corp. et al
Case No. 12-CV-4114

*Eastman Kodak Company v. Epson Imaging
Devices Corp. et al.*, Case No. 10-CV-5452

Target Corp., et. al., v. AU Optronics Corp. et al.,
Case No. 10-CV-4945

Individual Cases:

CASE NO. 10-CV-4572

CASE NO. 10-CV-5452

CASE NO. 10-CV-4945

CASE NO. 12-CV-4114

CERTIFICATION OF AUTHENTICITY

I, Hirohisa Ikutomi, declare as follows:

1. I am Manager of IR Disclosure Team, Global Finance Administration Center for Panasonic Corporation ("Panasonic"), and have held this position for half a year. I have personal knowledge of the facts set forth herein, and if called as a witness, I could and would competently testify thereto.

2. Attached hereto as Attachment A is a list identifying business records prepared and/or maintained by Panasonic ("the Records").

3. I am the custodian of the Records, or am otherwise qualified to attest to the manner and process by which these Records are created and maintained by virtue of my duties and responsibilities as a Manager at Panasonic.

4. The Records are true and correct duplicate copies of original business records prepared and/or maintained by Panasonic.

5. The Records were made at or near the time of the occurrences of the matters set forth by, or from information transmitted by, someone with knowledge of those matters.

UNITED STATES DISTRICT COURT,
NORTHERN DISTRICT OF CALIFORNIA
MDL No. 3:07-md-1827-SI

2013 Exhibit 2831

7. The Records were made as a regular practice of that business activity.

H. Ikutomi
Hirohisa Ikutomi

Master File No. M07-1827 SI
Individual Files 10-CV-4572; 10-CV-5452; 10-CV-4945; 12-CV-4114
2

ATTACHMENT A

Matsushita Electric Industrial Co., Ltd. Annual Report 2001

Matsushita Electric Industrial Co., Ltd. Annual Report 2002

Matsushita Electric Industrial Co., Ltd. Annual Report 2008

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

IN RE TFT-LCD (FLAT PANEL) ANTITRUST
LITIGATION

Master File No. 07-MD-1827 SI
MDL No. 1827

This Documents Relates To:

Individual Cases:

Best Buy Co., Inc. v. AU Optronics Corp., et al.,
Case No. 10-CV-4572

Case No. 10-CV-4572
Case No. 12-CV-4114
Case No. 10-CV-5452
Case No. 10-CV-4945

Best Buy Co., Inc. v. Toshiba Corp. et al.,
Case No. 12-CV-4114

DECLARATION OF CLARA CHANG

*Eastman Kodak Company v. Epson Imaging
Devices Corp., et al.*,
Case No. 10-CV-5452

The Honorable Susan Y. Illston

*Target Corp., et al. v. AU Optronics Corp., et
al.*,
Case No. 10-CV-4945

Master Case No. 3:07-MD-1827 SI
Individual Files: 10-CV-4572; 12-CV-4114
10-CV-5452; 10-CV-4945

DECLARATION OF CLARA CHANG

UNITED STATES DISTRICT COURT,
NORTHERN DISTRICT OF CALIFORNIA
MDL No. 3:07-md-1827-SI

2013 Exhibit 2833

I, Clara Chang, declare as follows:

1. I am Clara Chang, and I have worked for LG Electronics USA for 9 years. I am currently Sr. manager, and I have served in this role for 9 years.
2. I have personal knowledge of the facts set forth herein, and if called as a witness, I could and would competently testify thereto.
3. Attached hereto as Attachment A is a true and correct copy of a list of records created by the LG Electronics USA.
4. The records included in Attachment A are true and correct duplicate copies of original business records prepared and maintained by LG Electronics USA.
5. I swear or affirm that the following is true regarding the records included in Attachment A:
 - A. I am the custodian of the records, or I am an employee familiar with the manner and process by which these records are created and maintained, by virtue of my duties and responsibilities as PR manager;
 - B. The records were made at or near the time of the occurrences of the matters set forth, by, or from information transmitted by, personnel with knowledge of those matters;
 - C. The records were kept in the course of regularly conducted business activity;
 - D. It was the regular practice of LG Electronics USA to make the records.

I declare under penalty of perjury that the foregoing is true and correct. Executed this 5th day of June 2013, at New Jersey.

_____ 

Attachment A

LG Electronics Press Release, LG Electronics USA Names K.I Kown to President of the
Consumer Electronics Division

UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA
(SAN FRANCISCO DIVISION)

IN RE: TFT-LCD (FLAT PANEL)
ANTITRUST LITIGATION

MASTER CASE NO. 3:07-md-1827 SI, MQ
MDL NO. 1827

This Documents Relates To:

Best Buy v. AU Optronics Corp. et al,
Case No. 10-CV-4572,

Best Buy v. Toshiba Corp. et al
Case No. 12-CV-4114

*Eastman Kodak Company v. Epson Imaging
Devices Corp. et al.*, Case No. 10-CV-5452

Target Corp., et. al., v. AU Optronics Corp. et al.,
Case No. 10-CV-4945

Individual Cases:

CASE NO. 10-CV-4572

CASE NO. 10-CV-5452

CASE NO. 10-CV-4945

CASE NO. 12-CV-4114

**DECLARATION OF HYOUNG-GEUN
PARK**

I, Hyoun-Geun Park, declare as follows:

1. I have been employed by LG Electronics, Inc. ("LG") for 9 years. I am currently a senior manager in the consolidation team, and have held this position for 7 years. Except for those matters on information and belief, which I believe to be true, I have personal knowledge of the facts set forth herein, and if called as a witness, I could and would competently testify thereto.

2. Attached hereto as Attachment A is a list of business records prepared and/or maintained by LG ("the Records").

3. I am the custodian of the Records, or am otherwise qualified to attest to the manner and process by which these Records are created and maintained by virtue of my duties and responsibilities as a senior manager in the consolidation team at LG.

4. The Records are true and correct duplicate copies of original business records prepared and/or maintained by LG.

5. The Records were made at or near the time of the occurrences of the matters set forth by, or from information transmitted by, someone with knowledge of those matters.

CERTIFICATION OF AUTHENTICITY

Master File No. M07-1827 SI

Individual Files 10-CV-4572; 10-CV-5452; 10-CV-4945; 12-CV-4114

1

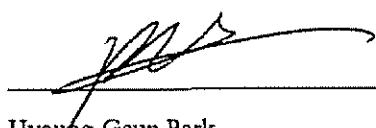
UNITED STATES DISTRICT COURT,
NORTHERN DISTRICT OF CALIFORNIA
MDL No. 1 07-md-1827-SI

2013 Exhibit 2834

1 6. The Records were kept in the course of a regularly conducted business activity.

2 7. The Records were made as a regular practice of that business activity.

3
4 I declare under penalty of perjury and criminal penalty under the laws of the United States of
5 America that the foregoing is true and correct. Executed this 12 day of July 2013.

6
7 
8 Hyoung-Geun Park
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

CERTIFICATION OF AUTHENTICITY

Master File No. M07-1827 SI

Individual Files 10-CV-4572; 10-CV-5452; 10-CV-4945; 12-CV-4114

ATTACHMENT A

LG ELECTRONICS INC. and Subsidiaries Audit Report for the Year Ended December 31, 1999

LG ELECTRONICS INC. and Subsidiaries Audit Report for the Year Ended December 31, 2000
and 1999

LG ELECTRONICS INC. and Subsidiaries Audit Report for the Year Ended December 31, 2001
and 2000

LG ELECTRONICS INC. Audit Report 2002

LG ELECTRONICS INC. and Subsidiaries Consolidated Financial Statements 2003 and 2002

LG ELECTRONICS INC. and Subsidiaries Consolidated Financial Statements 2004 and 2003

LG ELECTRONICS INC. and Subsidiaries Consolidated Financial Statements 2005 and 2004

LG ELECTRONICS INC. and Subsidiaries Consolidated Financial Statements 2006 and 2005

LG ELECTRONICS INC. and Subsidiaries Consolidated Financial Statements 2007 and 2006

LG ELECTRONICS INC. and Subsidiaries Consolidated Financial Statements 2008 and 2007

LG ELECTRONICS INC. and Subsidiaries Consolidated Financial Statements 2009 and 2008

LG ELECTRONICS INC. Separate Financial Statements December 31, 2010 and 2009

LG ELECTRONICS Consolidated Financial Statements December 31, 2012 and 2011

**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA
(SAN FRANCISCO DIVISION)**

IN RE: TFT-LCD (FLAT PANEL)
ANTITRUST LITIGATION

MASTER CASE NO. 3:07-md-1827 SI, MQ
MDL NO. 1827

This Documents Relates To:

Best Buy v. AU Optronics Corp. et al,
Case No. 10-CV-4572,

Best Buy v. Toshiba Corp. et al
Case No. 12-CV-4114

*Eastman Kodak Company v. Epson Imaging
Devices Corp. et al.*, Case No. 10-CV-5452

Target Corp., et. al., v. AU Optronics Corp. et al.,
Case No. 10-CV-4945

Individual Cases:

CASE NO. 10-CV-4572

CASE NO. 10-CV-5452

CASE NO. 10-CV-4945

CASE NO. 12-CV-4114

DECLARATION OF JIHYEOUN JANG

I, Jihyeoun Jang, declare as follows:

1. I am currently employed by LG Electronics, Inc. ("LG") as a marketing manager, and have held this position for 2.5 years. Except for those matters on information and belief, which I believe to be true, I have personal knowledge of the facts set forth herein, and if called as a witness, I could and would competently testify thereto.

2. Attached hereto as Attachment A is a list of business records prepared and/or maintained by LG ("the Records").

3. I am the custodian of the Records, or am otherwise qualified to attest to the manner and process by which these Records are created and maintained by virtue of my duties and responsibilities as a marketing manager at LG.

4. The Records are true and correct duplicate copies of original business records prepared and/or maintained by LG.

5. The Records were made at or near the time of the occurrences of the matters set forth by, or from information transmitted by, someone with knowledge of those matters.

CERTIFICATION OF AUTHENTICITY

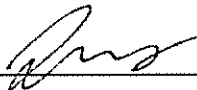
Master File No. M07-1827 SI

Individual Files 10-CV-4572; 10-CV-5452; 10-CV-4945; 12-CV-4114

1

6. The Records were kept in the course of a regularly conducted business activity.
7. The Records were made as a regular practice of that business activity.

I declare under penalty of perjury and criminal penalty under the laws of the United States of America that the foregoing is true and correct. Executed this 10 day of July 2013.



Jihyeoun Jang

CERTIFICATION OF AUTHENTICITY

Master File No. M07-1827 SI
Individual Files 10-CV-4572; 10-CV-5452; 10-CV-4945; 12-CV-4114

2

Attachment A

LG ELECTRONICS INC. Annual Report 1998
LG ELECTRONICS INC. Annual Report 1999
LG ELECTRONICS INC. Annual Report 2000
LG ELECTRONICS INC. Annual Report 2001
LG ELECTRONICS INC. Annual Report 2002
LG ELECTRONICS INC. Annual Report 2003
LG ELECTRONICS INC. Annual Report 2004

SF1 1959072v.1

UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA
(SAN FRANCISCO DIVISION)

IN RE: TFT-LCD (FLAT PANEL)
ANTITRUST LITIGATION

MASTER CASE NO. 3:07-md-1827 SI, MQ
MDL NO. 1827

This Documents Relates To:

Best Buy v. AU Optronics Corp. et al.,
Case No. 10-CV-4572,

Best Buy v. Toshiba Corp. et al
Case No. 12-CV-4114

*Eastman Kodak Company v. Epson Imaging
Devices Corp. et al.*, Case No. 10-CV-5452

Target Corp., et. al., v. AU Optronics Corp. et al.,
Case No. 10-CV-4945

Individual Cases:

CASE NO. 10-CV-4572

CASE NO. 10-CV-5452

CASE NO. 10-CV-4945

CASE NO. 12-CV-4114

CERTIFICATION OF AUTHENTICITY

I, Dylan Dunavan, declare as follows:

1. I currently hold the position of General Counsel of NEC Display Solutions of America, Inc. and have represented NEC Display Solutions of America, Inc. as in-house counsel since 2000. Except for those matters on information and belief, which I believe to be true, I have personal knowledge of the facts set forth herein, and if called as a witness, I could and would competently testify thereto.

2. Attached hereto as Attachment A is a list of business records (identified by document name)("the Records").

3. I am qualified to attest to the manner and process by which these Records are created and maintained by virtue of my duties and responsibilities as General Counsel at NEC Display Solutions of America, Inc.

4. The Records are true and correct duplicate copies of original business records prepared and/or maintained by the following NEC entities:

a. Records Nos. 1-6, 7, 10 and 13: NEC Corporation

CERTIFICATION OF AUTHENTICITY

Master File No. M07-1827 SI

Individual Files 10-CV-4572; 10-CV-5452; 10-CV-4945; 12-CV-4114

UNITED STATES DISTRICT COURT,
NORTHERN DISTRICT OF CALIFORNIA
MDL No. 3:07-md-1827-SI

2013 Exhibit 2836

b. Records Nos. 8-9: NEC Display Solutions of America, Inc.


c. Records Nos. 11-12: NEC Corporation of America

5. The Records were made at or near the time of the occurrences of the matters set forth by, or from information transmitted by, someone with knowledge of those matters.

6. The Records were kept in the course of a regularly conducted business activity.

7. The Records were made as a regular practice of that business activity.

I declare under penalty of perjury and criminal penalty under the laws of the United States of America that the foregoing is true and correct. Executed this 16th day of July 2013.


Dylan Dunavan

CERTIFICATION OF AUTHENTICITY

Master File No. M07-1827 SI
Individual Files 10-CV-4572; 10-CV-5452; 10-CV-4945; 12-CV-4114
2

2836-0002

ATTACHMENT A

1. NEC Corp. Form 20-F for the Fiscal Year Ended March 31, 2000
2. NEC Corp. Form 20-F for the Fiscal Year Ended March 31, 2001
3. NEC Corp. Form 20-F for the Fiscal Year Ended March 31, 2002
4. NEC Corp. Form 20-F for the Fiscal Year Ended March 31, 2003
5. NEC Corp. Form 20-F for the Fiscal Year Ended March 31, 2004
6. NEC Corp. Form 20-F for the Fiscal Year Ended March 31, 2005
7. Press Release, NEC & Mitsubishi Electric Establish Display Monitor Business, Jan. 28, 2000
available at www.nec.co.jp/press/en/0001/2801.html.
8. Press Release, NEC-Mitsubishi Electric Visual Systems Corporation to Become NEC Corporation Wholly-Owned Subsidiary, dated Feb. 21, 2005 available at <http://www.necdisplay.com/press-release/nec-mitsubishi-electric-visual-systems-corporation/256>.
9. Press Release, NEC-Mitsubishi Begins Operations as NEC Display Solutions, Apr. 1, 2005 available at www.necdisplay.com/press-release/nec-mitsubishi-begins-operations-as-nec-displays/413.
10. Press Release, NEC Solutions (America), Inc. Launched Today Formed From Integration of Three NEC Companies, Apr. 1, 2002 available at www.nec.co.jp/press/en/0204/0102.html.
11. Press Release, NEC Corporation of America Begins Operations as a Newly Integrated Company, July 3, 2006 available at www.necunifiedsolutions.com/main/NewsEvents/NewPressPage.asp?release=2006070301.xml.
12. Press Release, NEC Sets TPC Benchmark E (TPC-E) Performance Record, Mar. 29, 2012 available at www.necam.com/About/read.cfm?ID=932e575c-9ddf-42d4-841a-cc052b591975.
13. Press Release, NEC USA, NEC America & NEC Solutions (America) to be Combined to Form NEC Corporation of America, Apr. 26, 2006 available at www.nec.co.jp/press/en/0604/2602.html.

CERTIFICATION OF AUTHENTICITY

Master File No. M07-1827 SI

Individual Files 10-CV-4572; 10-CV-5452; 10-CV-4945; 12-CV-4114

**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA
(SAN FRANCISCO DIVISION)**

IN RE: TFT-LCD (FLAT PANEL)
ANTITRUST LITIGATION

MASTER CASE NO. 3:07-md-1827 SI, MQ
MDL NO. 1827

This Documents Relates To:

Best Buy v. AU Optronics Corp. et al,
Case No. 10-CV-4572,

Best Buy v. Toshiba Corp. et al
Case No. 12-CV-4114

*Eastman Kodak Company v. Epson Imaging
Devices Corp. et al.*, Case No. 10-CV-5452

Individual Cases:

CASE NO. 10-CV-4572
CASE NO. 10-CV-5452
CASE NO. 10-CV-4945
CASE NO. 12-CV-4114

CERTIFICATION OF AUTHENTICITY

I, Keiji Ushijima, declare as follows:

1. I currently hold the position of Associate Senior Vice President and General Manager of Legal & IPR Division of NEC LCD Technologies, Ltd. (currently NLT Technologies, Ltd., "NLT").

Except for those matters on information and belief, which I believe to be true, I have personal knowledge of the facts set forth herein, and if called as a witness, I could and would competently testify thereto.

2. Attached hereto as Attachment A is a list of business records (identified by document name) prepared and/or maintained by NLT ("the Records").

3. I am qualified to attest to the manner and process by which these Records are created and maintained by virtue of my duties and responsibilities as Associate Senior Vice President and General Manager of Legal & IPR Division of NLT.

4. The Records are true and correct duplicate copies of original business records prepared and/or maintained by NLT.

5. The Records were made at or near the time of the occurrences of the matters set forth by, or from information transmitted by, someone with knowledge of those matters.

CERTIFICATION OF AUTHENTICITY

Master File No. M07-1827 SI

Individual Files 10-CV-4572; 10-CV-5452; 10-CV-4945; 12-CV-4114

7. The Records were made as a regular practice of that business activity.


Keiji Ushijima

2

ATTACHMENT A

1. Press Release, Capital Alliance, February 25, 2011, available at http://www.nlt-technologies.co.jp/en/release/release_110225.html.
2. Press Release, About the new company name announced today, April 18, 2011, available at http://www.nlt-technologies.co.jp/en/release/release_110418.html.

CERTIFICATION OF AUTHENTICITY

Master File No. M07-1827 SI

Individual Files 10-CV-4572; 10-CV-5452; 10-CV-4945; 12-CV-4114

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

CERTIFICATION OF AUTHENTICITY

Master File No. M07-1827 SI

Individual Files 10-CV-4572; 10-CV-5452; 10-CV-4945; 12-CV-4114

4

2837-0004

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

IN RE TFT-LCD (FLAT PANEL) ANTITRUST
LITIGATION

Master File No. 07-MD-1827 SI
MDL No. 1827

This Documents Relates To:

Individual Cases:

Case No. 10-CV-4572

Case No. 12-CV-4114

Case No. 10-CV-5452

Case No. 10-CV-4945

Best Buy Co., Inc. v. AU Optronics Corp., et al.,
Case No. 10-CV-4572

Best Buy Co., Inc. v. Toshiba Corp. et al.,
Case No. 12-CV-4114

DECLARATION OF KYUSUNG LEE

*Eastman Kodak Company v. Epson Imaging
Devices Corp., et al.,*
Case No. 10-CV-5452

The Honorable Susan Y. Illston

*Target Corp., et al. v. AU Optronics Corp., et
al.,*
Case No. 10-CV-4945

Master Case No. 3:07-MD-1827 SI
Individual Files: 10-CV-4572; 12-CV-4114
10-CV-5452; 10-CV-4945

DECLARATION OF KYUSUNG LEE

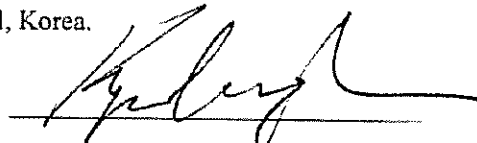
UNITED STATES DISTRICT COURT,
NORTHERN DISTRICT OF CALIFORNIA
MDL No. 1827-SI

2013 Exhibit 2838

I, Kyusung Lee, declare as follows:

1. I joined Samsung Electronics Co., Ltd. in 2001, and currently serve as Vice President at the Global Legal Affairs Team.
2. I have personal knowledge of the facts set forth herein, and if called as a witness, I could and would competently testify thereto.
3. Attached hereto as Attachment A is a true and correct copy of a list of records created by Samsung Electronics Co., Ltd.
4. The records included in Attachment A are true and correct duplicate copies of original business records prepared and maintained by Samsung Electronics Co., Ltd.
5. I swear or affirm that the following is true regarding the records included in Attachment A:
 - A. I am an employee familiar with the manner and process by which these records are created and maintained, by virtue of my duties and responsibilities as Vice President of Global Legal Affairs;
 - B. The records were made at or near the time of the occurrences of the matters set forth, by, or from information transmitted by, personnel with knowledge of those matters;
 - C. The records were kept in the course of regularly conducted business activity;
 - D. It was the regular practice of Samsung Electronics Co., Ltd. to make the records.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct. Executed this 18th day of July, 2013, in Seoul, Korea.


Kyusung Lee, Vice President

Attachment A

Samsung Electronics 1998 Annual Report

Samsung Electronics 1999 Annual Report

Samsung Electronics 2000 Annual Report

Samsung Electronics 2001 Annual Report

Samsung Electronics 2002 Annual Report

Samsung Electronics 2003 Annual Report

Samsung Electronics 2004 Annual Report

Samsung Electronics 2005 Annual Report

Samsung Electronics 2006 Annual Report

Samsung Electronics 2007 Annual Report

Samsung Electronics 2008 Annual Report

Samsung Electronics 2009 Annual Report

Samsung Electronics 2010 Annual Report

Samsung Electronics 2011 Annual Report

Samsung Electronics Co., Ltd. Audit Report 2001

Samsung Electronics Co., Ltd. Audit Report 2002

Samsung Electronics Co., Ltd Notes to Consolidated Financial Statements December 31, 1999

Samsung Electronics Co., Ltd and Subsidiaries Notes to Consolidated Financial Statements
December 31, 2000 and 1999

Samsung Electronics Co., Ltd and Subsidiaries Notes to Consolidated Financial Statements
December 31, 2001 and 2000

Samsung Electronics Co., Ltd and Subsidiaries Notes to Consolidated Financial Statements
December 31, 2002 and 2001

Samsung Electronics Co., Ltd and Subsidiaries Notes to Consolidated Financial Statements
December 31, 2003 and 2002

Samsung Electronics Co., Ltd and Subsidiaries Notes to Consolidated Financial Statements
December 31, 2004 and 2003

Samsung Electronics Co., Ltd and Subsidiaries Notes to Consolidated Financial Statements
December 31, 2005 and 2004

Samsung Electronics Co., Ltd and Subsidiaries Notes to Consolidated Financial Statements
December 31, 2006 and 2005

Samsung Electronics Co., Ltd and Subsidiaries Notes to Consolidated Financial Statements
December 31, 2007 and 2006

Samsung Electronics Co., Ltd and Subsidiaries Notes to Consolidated Financial Statements
December 31, 2008 and 2007

Samsung Electronics Co., Ltd and Subsidiaries Notes to Consolidated Financial Statements
December 31, 2009 and 2008

Samsung Electronics Co., Ltd and Subsidiaries Notes to Consolidated Financial Statements
(2010)

Samsung Electronics Co., Ltd and Subsidiaries Notes to Consolidated Financial Statements
(2011)

Samsung Electronics Co., Ltd and Subsidiaries Notes to Consolidated Financial Statements
(2012)

Samsung Electronics Co., Ltd. Audit Report 2004

Samsung Electronics Co., Ltd. Audit Report 2005

Samsung Electronics Co., Ltd. Non-Consolidated Financial Statements December 31, 2006 and
2005

Samsung Electronics Co., Ltd. Non-Consolidated Financial Statements December 31, 2007 and
2006

Samsung Electronics Co., Ltd. Non-Consolidated Financial Statements December 31, 2008 and
2007

EXHIBIT C

IN RE TFT-LCD (FLAT PANEL) ANTITRUST LITIGATION
Master File No. 07-MD-1827 SI
MDL No. 1827

Best Buy Co., Inc. v. AU Optronics Corp., et al.,
Case No. 10-CV-4572

Best Buy Co., Inc. v. Toshiba Corp. et al.,
Case No. 12-CV-4114

**Ownership/Control Relationships
and Supporting Evidence**

I. TOSHIBA

1. Toshiba Corporation owned 100 percent of Toshiba America, Inc. (“TAI”) from 1998 through 2006.¹
2. TAI owned 100 percent of Toshiba America Information Systems (“TAIS”) from 1998 through 2006.²
3. TAI owned 100 percent of Toshiba America Consumer Products LLC (“TACP”) from 1998 through 2006. During part of the period from 1998 through 2006, TACP was also known as Toshiba America Consumer Products, Inc.³
4. TAI owned 100 percent of Toshiba America Electronic Components, Inc. (“TAEC”) from 1998 through 2006.⁴
5. Toshiba Corporation owned 60 percent of Toshiba Matsushita Display Technology Co., Ltd. (“TMD”) from April 1, 2002 through 2006.⁵
6. Matsushita Electric Industrial Co., Ltd. (“Matsushita”) (n.k.a. Panasonic Corporation) owned 40 percent of TMD from April 1, 2002 through 2006.⁶

II. SAMSUNG

1. Samsung Electronics Co., Ltd. owned 100 percent of Samsung Electronics America, Inc. from 1998 through 2006.⁷

III. SHARP

1. Sharp Electronics Corporation was a subsidiary of Sharp Corporation from 1998 through 2006.⁸

IV. LGE

1. LG Electronics, Inc. ("LGE Korea") owned at least 99.7% of LG Electronics USA, Inc. ("LGE USA") from 1998 through 2006.⁹

2. LGE Korea owned 100 percent of LG Electronics MobileComm U.S.A., Inc. (f.k.a LG Infocomm U.S.A., Inc.) ("LGE MobileComm") from 2001 through 2006.¹⁰

3. LGE Korea owned 100 percent of Zenith Electronics Corporation (f.k.a Zenith Electronics LLC) ("Zenith") from 1999 through 2006.¹¹

V. PHILIPS

1. Koninklijke Philips Electronics N.V. ("Royal Philips Electronics") owned 100 percent of Philips Electronics North America Corporation ("PENAC") from 2000 through 2006.¹²

VI. LG DISPLAY CO., LTD

1. LGE Korea and Koninklijke Philips Electronics N.V. ("Royal Philips") held the following ownership interests in LG Display Co., Ltd. (f.k.a LG.Philips LCD Co., Ltd.) ("LGD") from July 26, 1999 through 2006:

- a. 1999: LGE Korea – 50 percent;¹³ Royal Philips – 50 percent¹⁴
- b. 2000: LGE Korea – 50 percent;¹⁵ Royal Philips – 50 percent¹⁶
- c. 2001: LGE Korea – 50 percent;¹⁷ Royal Philips – 50 percent¹⁸
- d. 2002: LGE Korea – 50 percent;¹⁹ Royal Philips – 50 percent²⁰
- e. 2003: LGE Korea – 50 percent;²¹ Royal Philips - unspecified
- f. 2004: LGE Korea – 44.57 percent;²² Royal Philips – 44.6 percent²³
- g. 2005: LGE Korea – 37.9 percent;²⁴ Royal Philips – 32.9 percent²⁵
- h. 2006: LGE Korea – 37.9 percent;²⁶ Royal Philips – 32.9 percent²⁷

VII. PANASONIC

1. Panasonic Corporation of North America (f.k.a Matsushita Electric Corporation of America) (“PNA”) was a principal overseas subsidiary of Panasonic Corporation (f.k.a. Matsushita Electrical Industrial Corporation, Ltd.) from 2001 through 2002, and a wholly-owned subsidiary of Panasonic Corporation from 2003 through 2006.²⁸

2. On April 1, 2011, Sanyo Consumer Electronics Co., Ltd. became a wholly owned subsidiary of Panasonic Corporation.²⁹

3. “National” was a Panasonic brand name from at least 2003 through 2006.³⁰

VIII. NEC

1. On January 28, 2000, NEC-Mitsubishi Electric Visual Systems Corporation was formed by NEC Corp. and Mitsubishi Electric Corp., with each owning 50% of NEC-Mitsubishi Electric Visual Systems Corporation. On March 31, 2005, NEC-Mitsubishi Electric Visual Systems Corporation became a wholly-owned subsidiary of NEC Corp., and was renamed to NEC Display Solutions.³¹

2. On March 31, 2005, NEC Display Solutions (f.k.a NEC-Mitsubishi Electric Visual Systems Corporation) became a wholly-owned subsidiary of NEC Corp. As of at least April 1, 2005, NEC Display Solutions of America, Inc. (f.k.a NEC-Mitsubishi Electronics Display of America, Inc.) was a wholly owned subsidiary of NEC Display Solutions.³²

3. On April 1, 2003, NEC Corp. established NEC LCD Technologies, Ltd. (n.k.a NLT Technologies, Ltd.), and NEC Corp. owned 100 percent of NEC LCD Technologies, Ltd. from April 1, 2003 through 2006.³³

¹ See Dkt. 8343 (Stip and Order re Ownership Relationships of the Toshiba Entities).

² See Dkt. 8343 (Stip and Order re Ownership Relationships of the Toshiba Entities).

³ See Dkt. 8343 (Stip and Order re Ownership Relationships of the Toshiba Entities).

⁴ See Dkt. 8343 (Stip and Order re Ownership Relationships of the Toshiba Entities).

⁵ See Dkt. 8343 (Stip and Order re Ownership Relationships of the Toshiba Entities).

⁶ See Dkt. 8343 (Stip and Order re Ownership Relationships of the Toshiba Entities).

⁷ See

- A. **Ex. 2179** (Samsung 1998 Annual Report at p. 45) (lists SEA as a subsidiary with SEC having a "Percentage of Ownership" of 100);
- B. **Ex. 2180** (Samsung 1999 Annual Report at p. 56) (lists SEA as a subsidiary with SEC having a "Percentage of Ownership" of 100);
- C. **Ex. 2181** (Samsung 2000 Annual Report at p. 62) (lists SEA as a subsidiary with SEC having a "Percentage of Ownership" of 100);
- D. **Exs. 2197 and 2207** (Samsung Audit Report for the years 2000 and 2001 at p. 23) (lists SEA as a subsidiary with SEC having a "Percentage of Ownership" of 100);
- E. **Exs. 2198 and 2208** (Samsung Audit Report for the years 2001 and 2002 at p. 22) (lists SEA as a subsidiary with SEC having a "Percentage of Ownership" of 100);
- F. **Exs. 2209 and 2200** (Samsung Audit Report for the years 2003 and 2004 at p. 27) (lists SEA as a subsidiary with SEC having a "Percentage of Ownership" of 100);
- G. **Exs. 2201 and 2210** (Samsung Audit Report for the years 2004 and 2005 at p. 31 of the file (unpaginated)) (lists SEA as a subsidiary with SEC having a "Percentage of Ownership" of 100);
- H. **Ex. 2186** (Samsung 2005 Annual Report at p. 85) (lists SEA as a subsidiary with SEC having a "Percentage of Ownership" of 100);
- I. **Ex. 2187** (Samsung 2006 Annual Report at p. 75) (lists SEC as a subsidiary with Samsung having a "Percentage of Ownership" of 100);
- J. **Exs. 2202 and 2211** (Samsung Non-Consolidated Financial Statements for the years 2005 and 2006 at p. 25) (lists SEA as a subsidiary with SEC having a "Percentage of Ownership" of 100);
- K. **Ex. 2188** (Samsung 2007 Annual Report at p. 78) (lists SEA as a subsidiary with SEC having a "Percentage of Ownership" of 100);
- L. **Exs. 2203 and 2212** (Samsung Consolidated Financial Statements for the years 2006 and 2007 at p. 14) (lists SEA as a subsidiary with SEC having a "Percentage of Ownership" of 100).

⁸ See

- A. **Ex. 2227** (Sharp 100th Anniversary, A Century of Sincerity and Creativity, May 2012 at pp. 24) ("In May 1962, the company's first overseas sales subsidiary, Sharp Electronics Corporation (SEC), was established in the heart of Manhattan. A wholly-owned subsidiary ..., it had 14 employees, including five from Japan.");
- B. **Ex. 2214** (Sharp 2000 Annual Report at p. 38) (lists SEC as a consolidated subsidiary, but no ownership percentage indicated);
- C. **Ex. 2215** (Sharp 2001 Annual Report at p. 44) (lists SEC as a consolidated subsidiary, but no ownership percentage indicated);
- D. **Ex. 2216** (Sharp 2002 Annual Report at p. 40) (listing SEC as a consolidated subsidiary, but no ownership percentage indicated);
- E. **Ex. 2827** (Declaration of T. Horiuchi) (Sharp 2003 Annual Report at p. 42) (lists SEC as a consolidated subsidiary, but no ownership percentage indicated);
- F. **Ex. 2218** (Sharp 2004 Annual Report at p. 48) (lists SEC as a consolidated subsidiary, but no ownership percentage indicated);
- G. **Ex. 2219** (Sharp 2005 Annual Report at p. 47) (lists SEC as a consolidated subsidiary, but no ownership percentage indicated);
- H. **Ex. 2220** (Sharp 2006 Annual Report at p. 55) (lists SEC as a consolidated subsidiary, but no ownership percentage indicated);

-
- I. **Ex. 2221** (Sharp 2007 Annual Report at p. 64) (lists SEC as a consolidated subsidiary, but no ownership percentage indicated).

⁹ See

- A. **Ex. 2100** (LGE 1998 Annual Report at p. 31) (LGE had a “Percentage of Ownership” in LGE USA of 99.7);
- B. **Ex. 2101** (LGE 1999 Annual Report at p. 33) (LGE had a “Percentage of Ownership” in LGE USA of 100);
- C. **Ex. 2102** (LGE 2000 Annual report at p. 58) (LGE had a “Percentage of Ownership” in LGE USA of 100);
- D. **Ex. 2103** (LGE 2001 Annual Report at p. 63) (LGE had a “Percentage of Ownership” in LGE USA of 100);
- E. **Ex. 2104** (LGE 2002 Annual Report at pp. 64-65) (LGE had a “Percentage of Ownership” in LGE USA of 100);
- F. **Ex. 2105** (LGE 2003 Annual Report at p. 73) (LGE had a “Percentage of Ownership” in LGE USA of 100);
- G. **Ex. 2106** (LGE 2004 Annual Report at p. 84) (LGE had a “Percentage of Ownership” in LGE USA of 100);
- H. **Ex. 2090** (LGE 1999 Audit Report at p. 21) (LGE had a “Percentage of Ownership” in LGE USA of 100);
- I. **Ex. 2091** (LGE 2000 Audit Report at p. 24) (LGE had a “Percentage of Ownership” in LGE USA of 100);
- J. **Ex. 2092** (LGE Audit Report for the years 2000 and 2001 at p. 24) (LGE had a “Percentage of Ownership” in LGE USA of 100);
- K. **Ex. 2107** (LGE 2002 Audit Report at p. 23) (LGE had a “Percentage of Ownership” in LGE USA of 100);
- L. **Ex. 2093** (LGE Consolidated Financial Statements for the years 2002 and 2003 at p. 12) (LGE had a “Percentage of Ownership” in LGE USA of 100);
- M. **Ex. 2094** (LGE Consolidated Financial Statements for the years 2003 and 2004 at p. 12) (LGE had a “Percentage of Ownership” in LGE USA of 100);
- N. **Ex. 2095** (LGE Consolidated Financial Statements for the years 2004 and 2005 at p. 12) (LGE had a “Percentage of Ownership” in LGE USA of 100);
- O. **Ex. 2096** (LGE Consolidated Financial Statements for the years 2005 and 2006 at p. 12) (LGE had a “Percentage of Ownership” in LGE USA of 100);
- P. **Ex. 2097** (LGE Consolidated Financial Statements for the years 2006 and 2007 at p. 13) (LGE had a “Percentage of Ownership” in LGE USA of 100).

¹⁰ See

- A. **Ex. 2092** (LGE 2001 Audit Report at p. 24) (LGE Korea had a “Percentage of Ownership” in LG Infocomm U.S.A. Inc. of 100);
- B. **Ex. 2107** (LGE 2002 Audit Report at p. 23) (LGE Korea had a “Percentage of Ownership” in LG Infocomm U.S.A. Inc. of 100);
- C. **Ex. 2093** (LGE Consolidated Financial Statements for the years 2002 and 2003 at p. 12) (LGE Korea had a “Percentage of Ownership” in LG Electronics LG Infocomm, U.S.A. of 100);
- D. **Ex. 2094** (LGE Consolidated Financial Statements for the years 2003 and 2004 at p. 12) (LGE Korea had a “Percentage of Ownership” in LG Electronics MobileComm U.S.A., Inc., formerly LG Infocomm U.S.A., Inc., of 100);
- E. **Ex. 2095** (LGE Consolidated Financial Statements for the years 2004 and 2005 at p. 11) (LGE Korea had a “percentage of Ownership” in LG Electronics MobileComm U.S.A. Inc. of 100);
- F. **Ex. 2096** (LGE Consolidated Financial Statements for the years 2005 and 2006 at p. 11) (LGE Korea had a “Percentage of Ownership” in LG Electronics MobileComm U.S.A. Inc. of 100);
- G. **Ex. 2097** (LGE Consolidated Financial Statements for the years 2006 and 2007 at p. 13) (LGE Korea had a “Percentage of Ownership” in LG Electronics MobileComm U.S.A. Inc. of 100).

¹¹ See

- A. **Ex. 2100** (LGE 1998 Annual Report at p. 31) (lists LGE Korea as having a “Percentage of Ownership” in Zenith of 15.51);
- B. **Ex. 2090** (LGE 1999 Audit Report at p. 21) (LGE Korea has a “Percentage of Ownership” in Zenith of 100);
- C. **Ex. 2091** (LGE Audit Report for the years 1999 and 2000) at p. 24 (LGE Korea has a “Percentage of Ownership” in Zenith of 100);

-
- D. **Ex. 2102** (LGE 2000 Annual Report at p. 58) (LGE Korea had a “Percentage of Ownership” in Zenith of 100);
 - E. **Ex. 2092** (LGE Audit Report for the years 2000 and 2001 at p. 24) (LGE Korea has a “Percentage of Ownership” in Zenith of 100);
 - F. **Ex. 2103** (LGE 2001 Annual Report at p. 63) (LGE Korea had a “Percentage of Ownership” in Zenith of 100);
 - G. **Ex. 2107** (LGE 2002 Audit Report at p. 23) (LGE Korea has a “Percentage of Ownership” in Zenith of 100);
 - H. **Ex. 2104** (LGE 2002 Annual Report at p. 34) (LGE Korea had a “Percentage of Ownership” in Zenith of 100);
 - I. **Ex. 2093** (LGE Consolidated Financial Statements for the years 2002 and 2003 at p. 12) (LGE Korea has a “Percentage of Ownership” in Zenith of 100);
 - J. **Ex. 2105** (LGE Annual Report at p. 73) (LGE Korea had a “Percentage of Ownership” in Zenith of 100);
 - K. **Ex. 2094** (LGE Consolidated Financial Statements for the years 2003 and 2004 at p. 12) (LGE Korea had a “Percentage of Ownership” in Zenith of 100);
 - L. **Ex. 2106** (LGE 2004 Annual Report at p. 84) (LGE Korea had a “Percentage of Ownership” in Zenith of 100);
 - M. **Ex. 2095** (LGE Consolidated Financial Statements for the years 2004 and 2005 at p. 12) (LGE Korea had a “percentage of Ownership” in Zenith of 100);
 - N. **Ex. 2096** (LGE Consolidated Financial Statements for the years 2005 and 2006 at p. 12 (LGE Korea had a “Percentage of Ownership” in Zenith of 100);
 - O. **Ex. 2097** (LGE Consolidated Financial Statements for the years 2006 and 2007 at p. 13) (LGE Korea had a “Percentage of Ownership” in Zenith of 100).

¹² See

- A. **Ex. 2161** (Koninklijke Philips Electronics N.V. Form 20-F for the Fiscal Year Ended December 31, 2000 at Ex. 8, “List of Significant Subsidiaries”) (identifying PENAC as an entity 100% owned by Royal Philips);
- B. **Ex. 2162** (Koninklijke Philips Electronics N.V. Form 20-F for the Fiscal Year Ended December 31, 2001 at Ex. 8, “List of Significant Subsidiaries”) (identifying PENAC as an entity 100% owned by Royal Philips);
- C. **Ex. 2163** (Koninklijke Philips Electronics N.V. Form 20-F for the Fiscal Year Ended December 31, 2002 at Ex. 8, “List of Significant Subsidiaries”) (identifying PENAC as an entity 100% owned by Royal Philips);
- D. **Ex. 2164** (Koninklijke Philips Electronics N.V. Form 20-F for the Fiscal Year Ended December 31, 2003 at Ex. 8, “List of Significant Subsidiaries”) (identifying PENAC as an entity 100% owned by Royal Philips);
- E. **Ex. 2165** (Koninklijke Philips Electronics N.V. Form 20-F for the Fiscal Year Ended December 31, 2004 at Ex. 8, “List of Significant Subsidiaries”) (identifying PENAC as an entity 100% owned by Royal Philips);
- F. **Ex. 2166** (Koninklijke Philips Electronics N.V. Form 20-F for the Fiscal Year Ended December 31, 2005 at Ex. 8, “List of Significant Subsidiaries”) (identifying PENAC as an entity 100% owned by Royal Philips);
- G. **Ex. 2167** (Koninklijke Philips Electronics N.V. Form 20-F for the Fiscal Year Ended December 31, 2006 at Ex. 8, “List of Significant Subsidiaries”) (identifying PENAC as an entity 100% owned by Royal Philips).

¹³ See **Ex. 2101** (LG Electronics Inc. Annual Report 1999 at p. 20) (“As discussed in Note 7 to the accompanying financial statements, pursuant to a joint venture agreement with Koninklijke Philips Electronics N.V. (“Philips”) dated July 24, 1999, the Company transferred certain of the Company’s stock rights in LG. Philips LCD Co., Ltd. (formerly LG LCD Co., Ltd.) to Philips. As a result, the Company reduced its ownership of LG. Philips LCD Co., Ltd. to 50%”) and p. 32 (as of December 31, 1999, LGE Korea owns 50 percent of LG. Philips LCD Co., Ltd.).

¹⁴ See

- A. **Ex. 2829** (Declaration of C. Wolfsgruber) (Joint Venture Agreement between LGE and Philips dated July 26, 1999 at Sections 2.1, 2.2, 2.3, etc) (Philips to acquire 50% of LGD);
- B. **Ex. 2162** (Koninklijke Philips Electronics N.V. Form 20-F for the Fiscal Year Ended December 31, 2001 at p. 14) (LG.Philips LCD was a joint venture formed in July 1999 and is a 50/50 joint venture).

¹⁵ See **Ex. 2102** (LG Electronics Inc. Annual Report 2000 at p. 55) (as of December 31, 2000, LGE Korea owns 50 percent of LG Philips LCD Co., Ltd.).

¹⁶ See **Ex. 2161** (Koninklijke Philips Electronics N.V. Form 20-F for the Fiscal Year Ended December 31, 2000 at p. 60) ("LG.Philips LCD Co is a 50/50 manufacturing joint venture with LG Electronics of South Korea").

¹⁷ See **Ex. 2103** (LG Electronics Inc. Annual Report 2001 at p. 62) (as of December 31, 2001, LGE Korea owns 50 percent of LG. Philips LCD Co., Ltd.).

¹⁸ See **Ex. 2162** (Koninklijke Philips Electronics N.V. Form 20-F for the Fiscal Year Ended December 31, 2001 at p. 14) ("The 50/50 joint venture, LG.Philips LCD, continues to be a leader in the production of TFT LCDs for computer monitor and notebook applications and is supplying display panels for the fast growing consumer market of LCD TVs.").

¹⁹ See **Ex. 2104** (LG Electronics Inc. Annual Report 2002 at p. 63) (as of December 31, 2002, LGE Korea owns 50 percent of LG. Philips LCD Co., Ltd.).

²⁰ See **Ex. 2163** (Koninklijke Philips Electronics N.V. Form 20-F for the Fiscal Year Ended December 31, 2002, page number not available) ("LG.Philips LCD Co. is a 50/50 manufacturing joint venture with LG Electronics of South Korea").

²¹ See **Ex. 2105** (LG Electronics Inc. Annual Report 2003 at p. 71) (as of December 31, 2003, LGE Korea owns 50 percent of LG. Philips LCD Co., Ltd.).

²² See **Ex. 2106** (LG Electronics Inc. Annual Report 2004 at pp. 80-81) (as of December 31, 2004, LGE Korea owns 44.57 percent of LG.Philips LCD Co., Ltd.).

²³ See **Ex. 2165** (Koninklijke Philips Electronics N.V. Form 20-F for the Fiscal Year Ended December 31, 2004, page number not available) ("Philips owns 44.6% of LG.Philips LCD").

²⁴ See **Ex. 2095** (LG Electronics Inc. and Subsidiaries Consolidated Financial Statements December 31, 2005 and 2004 at p. 10) (as of December 31, 2005, LGE Korea owns 37.9 percent of LG.Philips LCD Co., Ltd.).

²⁵ See **Ex. 2166** (Koninklijke Philips Electronics N.V. Form 20-F for the Fiscal Year Ended December 31, 2005, page number not available) ("Philips sold common stock of LG.Philips LCD, further reducing its stake in LG.Philips LCD to 32.9%).

²⁶ See **Ex. 2096** (LG Electronics Inc. and Subsidiaries Consolidated Financial Statements December 31, 2006 and 2005 at p. 10) (as of December 31, 2006, LGE Korea owns 37.9 percent of LG.Philips LCD Co., Ltd.).

²⁷ See **Ex. 2167** (Koninklijke Philips Electronics N.V. Form 20-F for the Fiscal Year Ended December 31, 2006, page number not available) ("Furthermore, in 2005 the Company sold 27.4 ... million shares in LG.Philips LCD, resulting in ... a 7.6% reduction in the shareholding from 40.5% to 32.9%.").

²⁸ See

- A. **Ex. 2831** (Business Records Decl. of H. Ikutomi dated July 23, 2013) (Attachment A - Panasonic 2001 Annual Report at p. 58) (lists Matsushita Electric Corporation of America as a Principal Overseas Subsidiary);

-
- B. **Ex. 2831** (Business Records Decl. of H. Ikutomi dated July 23, 2013) (Attachment A - Panasonic 2002 Annual Report at p. 66) (lists Matsushita Electric Corporation of America as a Principal Overseas Subsidiary);
 - C. **Ex. 2145** (Matsushita Electric Industrial Co., Ltd. Form 20-F, for the fiscal year ended March 31, 2003) (lists "Percentage Owned" of PNA at 100%);
 - D. **Ex. 2146** (Matsushita Electric Industrial Co., Ltd. Form 20-F, for the fiscal year ended March 31, 2004) (lists "Percentage Owned" of PNA at 100%);
 - E. **Ex. 2147** (Matsushita Electric Industrial Co., Ltd. Form 20-F, for the fiscal year ended March 31, 2005) (lists "Percentage Owned" of PNA at 100%);
 - F. **Ex. 2148** (Matsushita Electric Industrial Co., Ltd. Form 20-F, for the fiscal year ended March 31, 2006) (lists "Percentage Owned" of PNA at 100%);
 - G. **Ex. 2149** (Matsushita Electric Industrial Co., Ltd. Form 20-F, for the fiscal year ended March 31, 2007) (lists "Percentage Owned" of PNA at 100%).

²⁹ See **Ex. 2153** (Panasonic Corporation Form 20-F, for the fiscal year ended March 31, 2011, at p. 5) ("On April 1, 2011, Panasonic made Panasonic Electric Works Co., Ltd. and SANYO Electric Co., Ltd. its wholly owned subsidiaries through share exchanges, respectively.") and p. 29 (noting that on "December 21, 2009, [Panasonic] ... acquired 50.2% of the voting rights of SANYO and obtained a controlling interest in SANYO").

³⁰ See

- A. **Ex. 2145** (Matsushita Electric Industrial Co., Ltd. Form 20-F, for the fiscal year ended March 31, 2003, at pp. 11, 24, 51, 53, and 95) (noting existence of National brand);
- B. **Ex. 2146** (Matsushita Electric Industrial Co., Ltd. Form 20-F, for the fiscal year ended March 31, 2004, at pp. 10, 14, 24, 25, 32, 57, 59, 62, and 106) (noting existence of National Brand);
- C. **Ex. 2147** (Matsushita Electric Industrial Co., Ltd. Form 20-F, for the fiscal year ended March 31, 2005, at pp. 10, 13, 27, 35, 61, 63, 67, and 113) (noting existence of National brand);
- D. **Ex. 2148** (Matsushita Electric Industrial Co., Ltd. Form 20-F, for the fiscal year ended March 31, 2006, at p. 10, 27, 36, 65, and 116) (noting existence of National brand);
- E. **Ex. 2149** (Matsushita Electric Industrial Co., Ltd. Form 20-F, for the fiscal year ended March 31, 2007, at p. 10, 23, 31, 114) (noting existence of National Brand).

³¹ See

- A. **Ex. 2127** (NEC Corp. Form 20-F for the Fiscal Year Ended March 31, 2000 at p. 5) (noting that NEC-Mitsubishi Electric Visual Systems Corporation was established in January 2000 by NEC and Mitsubishi Electric Corporation);
- B. **Ex. 2128** (NEC Corp. Form 20-F for the Fiscal Year Ended March 31, 2001 at p. 78) ("Investments in affiliated companies accounted for by the equity method together with a percentage of the Company's ownership of voting shares at March 31, 2001 are: NEC-Mitsubishi Electric Visual Systems Corporation (50.0%)");
- C. **Ex. 2129** (NEC Corp. Form 20-F for the Fiscal Year Ended March 31, 2002) (stating that NEC Corp. held a 50% ownership interest in NEC-Mitsubishi Electric Visual Systems);
- D. **Ex. 2130** (NEC Corp. Form 20-F for the Fiscal Year Ended March 31, 2003 at F-15) (stating that NEC Corp. held a 50% ownership interest in NEC-Mitsubishi Electric Visual Systems);
- E. **Ex. 2131** (NEC Corp. Form 20-F for the Fiscal Year Ended March 31, 2004 at F-16) (stating that NEC Corp. held a 50% ownership in NEC-Mitsubishi Electric Visual Systems);
- F. **Ex. 2132** (NEC Corp. Form 20-F for the Fiscal Year Ended March 31, 2005 at § 4.B (unpaginated) (discussing NEC Corp.'s joint venture in developing and producing LCDs);
- G. **Ex. 2139** (Press Release dated February 21, 2005) ("NEC-Mitsubishi Electronics Display ... today announced that its parent company NEC-Mitsubishi Electric Visual Systems Corporation ("NM Visual"), a joint venture company of NEC Corporation and Mitsubishi Electric Corporation since January 2000, will become a wholly-owned subsidiary of NEC Corporation on March 31, 2005" and that on "becoming a wholly-owned subsidiary of NEC Corporation ..., the company will be renamed and repositioned as an NEC display solutions company.");

-
- H. **Ex. 2138** (Press Release dated April 1, 2005, NEC-MITSUBISHI Begins Operations as NEC Display Solutions) (noting that the former joint venture with Mitsubishi was now named NEC Display Solutions and returned to operations under NEC).

³² See

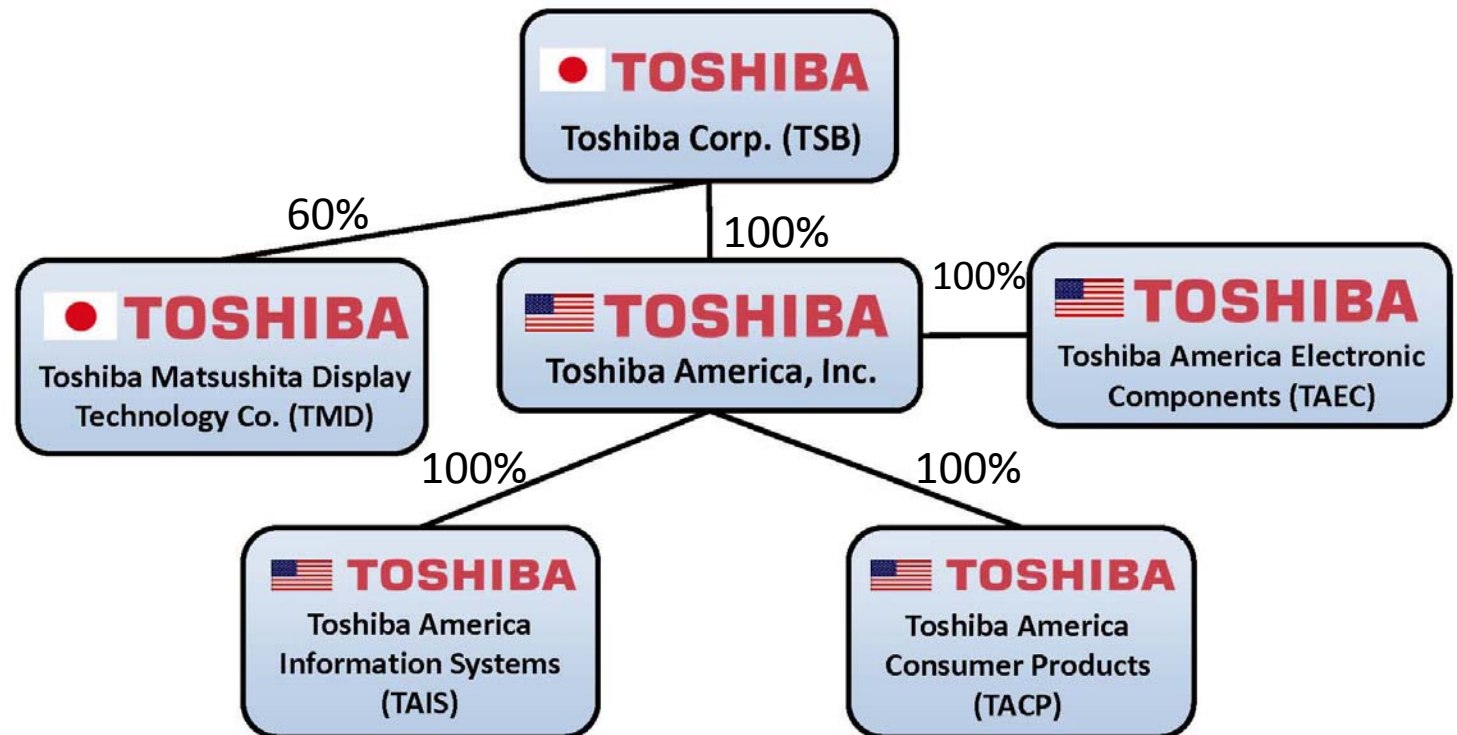
- A. **Ex. 2139** (Press Release dated February 21, 2005, NEC-Mitsubishi Electric Visual Systems Corporation to become NEC Corporation wholly-owned subsidiary) (“NEC-Mitsubishi Electronics Display ... today announced that its parent company NEC-Mitsubishi Electric Visual Systems Corporation (“NM Visual”), a joint venture company of NEC Corporation and Mitsubishi Electric Corporation since January 2000, will become a wholly-owned subsidiary of NEC Corporation on March 31, 2005” and that on “becoming a wholly-owned subsidiary of NEC Corporation ..., the company will be renamed and repositioned as an NEC display solutions company,” and that the change will have “little impact on the fundamentals of our business or day-to-day operations as NEC has already built a strong brand presence in North America.”);
- B. **Ex. 2138** (Press Release dated April 1, 2005, NEC-MITSUBISHI Begins Operations as NEC Display Solutions) (noting that NEC Display Solutions of America, Inc. was a business under NEC Display Solutions).

³³ See

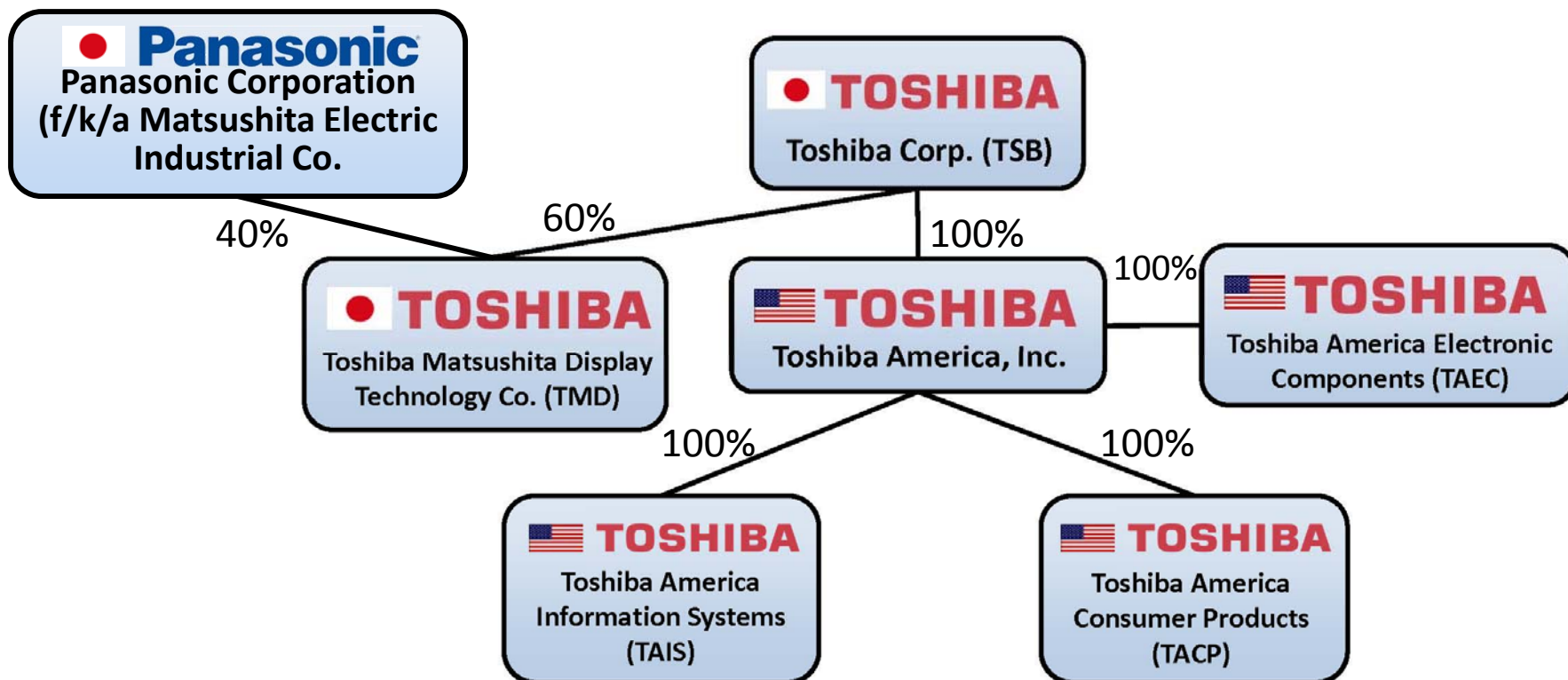
- A. **Ex. 2130** (NEC Corp. Form 20-F for the Fiscal Year Ended March 31, 2003 at p. 20) (noting that NEC transferred its color LCD business and transferred it to a subsidiary in 2003);
- B. **Ex. 2131** (NEC Corp. Form 20-F for the Fiscal Year Ended March 31, 2004 at p. 19) (same);
- C. **Ex. 2132** (NEC Corp. Form 20-F for the Fiscal Year Ended March 31, 2005 at § 4.B (unpaginated) (same);
- D. **Ex. 2828** (Declaration of S. Obata) (Press Release dated January 30, 2003, NEC Establishes New LCD Company to Develop Core LCD Technologies and Customized Products for the Industrial and High-End Monitor Markets) (noting that NEC Corp. formed NEC LCD Technologies, Ltd. on April 1, 2003);
- E. **Ex. 2828** (Declaration of S. Obata) (Press Release dated March 31, 2003, NEC Establishes Specialist LCD Company to Develop Core LCD Technologies and Customized Products for the Industrial and High-End Monitor Markets) (noting that NEC Corp. formed NEC LCD Technologies, Ltd. on April 1, 2003);
- F. **Ex. 2828** (Declaration of S. Obata) (Press Released dated February 25, 2011, The NEC Group and AVIC International Group Agree to a Capital Alliance to Strengthen the Small and Midsized Liquid Crystal Panel Business) (noting that NEC LCD Technologies will become a joint venture company with the AVIC International Group, and that, as of February 25, 2011, NEC LCD Technologies was 100% owned by NEC Corporation (see pg. 3 for ownership fact);
- G. **Ex. 2828** (Declaration of S. Obata) (Press Release dated April 18, 2011, About the new company name announced today) (noting that NEC LCD Technologies, Ltd. will start in July 2011 as a new joint venture between NEC Corp. and Shenzhen AVIC Optoelectronic Co., Ltd. and, as a result, be renamed to NLT Technologies, Ltd.).

EXHIBIT D

TOSHIBA



Panasonic[®]

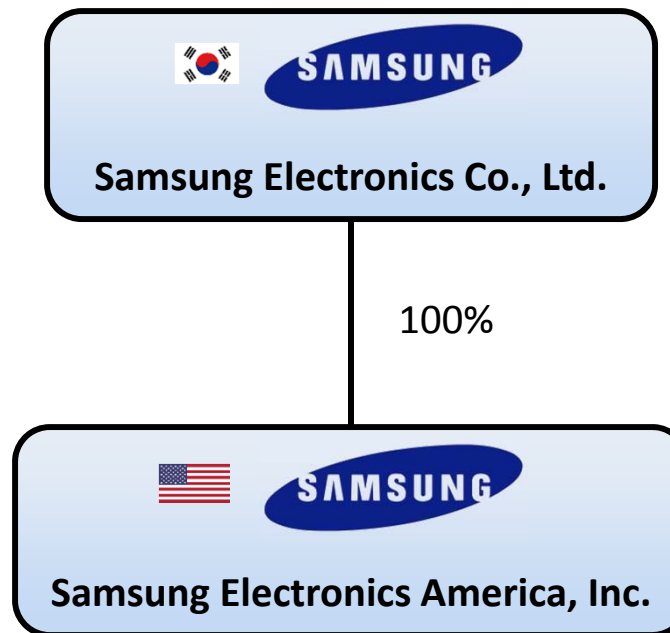


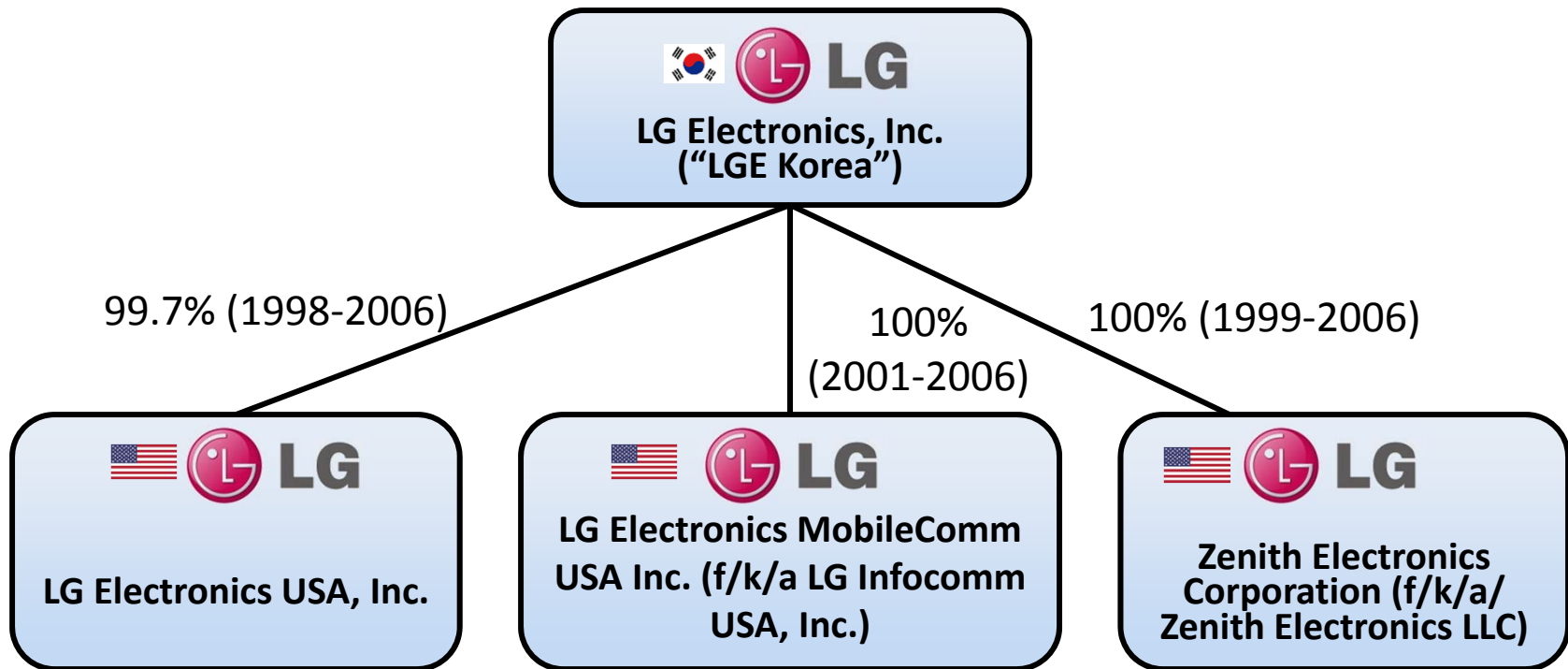
Panasonic®

 **Panasonic**
Panasonic Corporation
(f/k/a Matsushita Electric
Industrial Co.)

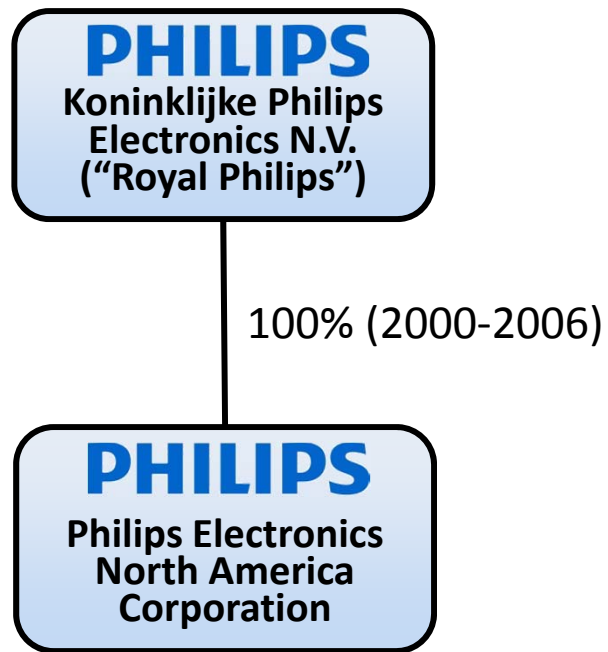
2001-2002 (principal overseas subsidiary)
2003-2006 (wholly owned subsidiary)

 **Panasonic**
Panasonic Corporation of
North America
(f/k/a Matsushita Electric
Corporation of America)





PHILIPS





PHILIPS



1999-2003 (50%)
2004 (44.57%)
2005-2006 (37.9%)



1999-2003 (50%)
2004 (44.6%)
2005-2006 (32.9%)

NEC

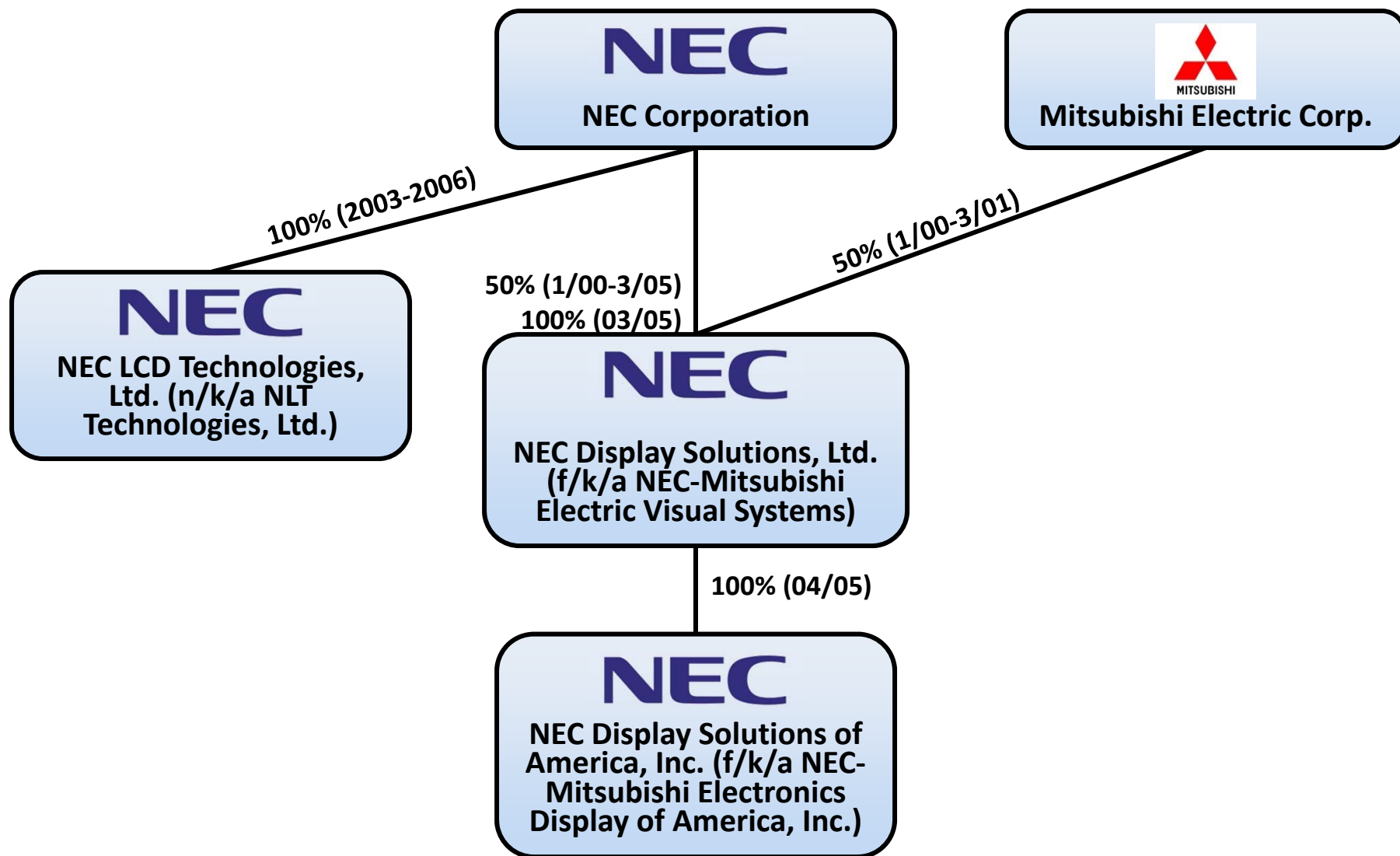


EXHIBIT E

ROBINS, KAPLAN, MILLER & CIRESI LLP

2049 CENTURY PARK EAST
SUITE 3400
LOS ANGELES, CA 90067-3208
TEL: 310-552-0130 FAX: 310-229-5800
www.rkmc.com

ATTORNEYS AT LAW

DAVID MARTINEZ

July 18, 2013

VIA E-MAIL

Jerome C. Roth
jerome.roth@mto.com
MUNGER, TOLLES & OLSON LLP
560 Mission Street, 27th Floor
San Francisco, CA 94105

Brad D. Brian
brad.brian@mto.com
MUNGER, TOLLES & OLSON LLP
355 South Grand Avenue, 35th Floor
Los Angeles, CA 90071

Christopher M. Curran
ccurran@whitecase.com
WHITE & CASE LLP
701 Thirteenth Street, NW
Washington, DC 20005

Martin M. Toto
mtoto@whitecase.com
WHITE & CASE LLP
1155 Avenue of the Americas
New York, NY 10036-2787

Robert E. Freitas
rfreitas@ftkaw.com
FREITAS TSENG & KAUFMAN LLP
100 Marine Parkway, Suite 200
Redwood Shores, CA 94065

Re: *Best Buy Co., Inc., et al. v. AU Optronics Corporation, et al.*
Best Buy Co., Inc., et al. v. Toshiba Corp., et al.
In Re TFT-LCD Antitrust Litigation
10-cv-4572 SI / 12-cv-4114 SI / 3:07-md-1827 SI

Dear Counsel:

We write to follow up on your discussions with Janet Levine immediately after the final pretrial conference, as well as during our call with counsel for LGD and Toshiba on July 11, 2013 regarding the ownership relationships amongst defendants and co-conspirator families. As you know, the Court instructed during the final pretrial conference that the parties stipulate to issues that are not in dispute. During our July 11, 2013 conference, counsel for Toshiba and LGE indicated that they were prepared to stipulate to any facts that Plaintiffs could establish through admissible proof.

Pursuant to the Courts' instruction and your representations during our call, as well as in Defendants' Opposition to Plaintiffs' Request for Judicial Notice ("RJN"), we enclose for your review and approval a stipulation regarding certain ownership relationships. These facts, and the

ATLANTA

BOSTON

LOS ANGELES

MINNEAPOLIS

NAPLES

NEW YORK

July 18, 2013

Page 2

supporting evidence, were presented to you on June 18, 2013 in connection with Plaintiffs' RJN. Since then, we have also provided you with custodian of records declarations for AUO, Samsung, LGE, Philips and NEC as set forth below. We expect to provide you with a declaration for Sharp shortly. As to Toshiba, we set forth the admissible evidence on which we intend to rely further below. Further, we have revised the Toshiba stipulated facts based on comments from Marty Toto during our call of July 11, 2013.

Samsung

- Declaration of Kyusung Lee

LGE

- Declarations of Jihyeon Jang, Hyoung-Geun Park, and Clara Chang

Philips

- Declaration of Christoph Wolfsgruber

NEC

- Declaration of Dylan Dunavan

Toshiba

- Toshiba Annual Reports dated 1998 through 2012
- Toshiba Corporate Description, Inside Toshiba, available at www.toshiba.com/tai/about_us.jsp.
- Toshiba Entities' Motion for Partial Summary Judgment Under *Illinois Brick*, dated September 9, 2011
- Toshiba Entities' Motion for Partial Summary Judgment Under *Illinois Brick* and *In re ATM Fee*, dated August 2, 2012
- Toshiba Entities' Objections and Responses to Direct Action Plaintiffs' First Set of Requests for Admission to Defendants Toshiba Corporation, Toshiba Mobile Display Co. Ltd., Toshiba America Electronic Components, Inc., and Toshiba America Information Systems, Inc., dated March 18, 2013
- Toshiba Entities' Objections and Responses to Direct Action Plaintiffs' First Set of Interrogatories to Defendants Toshiba Corporation, Toshiba Mobile Display Co. Ltd., Toshiba America Electronic Components, Inc., and Toshiba America Information Systems, Inc., dated March 18, 2013

July 18, 2013

Page 3

- Letter dated May 13, 2013 from Kristen J. McAhen of White & Case to Laura E. Nelson of Robins, Kaplan, Miller & Ciresi L.L.P. regarding the Direct Action Plaintiffs' First and Second Set of RFAs and Interrogatories to the Toshiba Entities.

Kindly review the proposed stipulation and advise whether you have any changes. We would like to get it on file by July 22, 2013.

Very truly yours,

ROBINS, KAPLAN, MILLER & CIRESI L.L.P.

/s/ David Martinez

David Martinez

ROBINS, KAPLAN, MILLER & CIRESI LLP

2049 CENTURY PARK EAST
SUITE 3400
LOS ANGELES, CA 90067-3208
TEL: 310-552-0130 FAX: 310-229-5800
www.rkmc.com

ATTORNEYS AT LAW

VINCENT LOH

July 19, 2013

VIA E-MAIL

Jerome C. Roth
jerome.roth@mto.com
MUNGER, TOLLES & OLSON LLP
560 Mission Street, 27th Floor
San Francisco, CA 94105

Brad D. Brian
brad.brian@mto.com
MUNGER, TOLLES & OLSON LLP
355 South Grand Avenue, 35th Floor
Los Angeles, CA 90071

Christopher M. Curran
ccurran@whitecase.com
WHITE & CASE LLP
701 Thirteenth Street, NW
Washington, DC 20005

Martin M. Toto
mtoto@whitecase.com
WHITE & CASE LLP
1155 Avenue of the Americas
New York, NY 10036-2787

Robert E. Freitas
rfreitas@ftkaw.com
FREITAS TSENG & KAUFMAN LLP
100 Marine Parkway, Suite 200
Redwood Shores, CA 94065

Re: *Best Buy Co., Inc., et al. v. AU Optronics Corporation, et al.*
Best Buy Co., Inc., et al. v. Toshiba Corp., et al.
In Re TFT-LCD Antitrust Litigation
10-cv-4572 SI / 12-cv-4114 SI / 3:07-md-1827 SI

Dear Counsel:

As referenced in David Martinez's letter dated July 18, 2013, attached please find the declaration of Tetsuhiro Horiuchi certifying documents as business records pursuant to Federal Rules of Evidence 902(11) or (12). The underlying documents were included on either Plaintiffs' Joint Initial Exhibit List or Plaintiffs' Supplemental Exhibit List and were the subject of the Track 1B Plaintiffs' Request for Judicial Notice.

ATLANTA

BOSTON

LOS ANGELES

MINNEAPOLIS

NAPLES

NEW YORK

July 19, 2013

Page 2

Please let me know whether the Track 1B Plaintiffs have your approval to file the stipulation and proposed order that was circulated by David Martinez yesterday. As previously mentioned, we would like to get it on file by July 22, 2013.

Very truly yours,

ROBINS, KAPLAN, MILLER & CIRESI L.L.P.

/s/ Vincent Loh

Vincent Loh

ROBINS, KAPLAN, MILLER & CIRESI LLP

2049 CENTURY PARK EAST
SUITE 3400
LOS ANGELES, CA 90067-3208
TEL: 310-552-0130 FAX: 310-229-5800
www.rkmc.com

ATTORNEYS AT LAW

DAVID MARTINEZ

July 24, 2013

VIA E-MAIL

Christopher M. Curran
ccurran@whitecase.com
WHITE & CASE LLP
701 Thirteenth Street, NW
Washington, DC 20005

Martin M. Toto
mtoto@whitecase.com
WHITE & CASE LLP
1155 Avenue of the Americas
New York, NY 10036-2787

Robert E. Freitas
rfreitas@ftkaw.com
FREITAS TSENG & KAUFMAN LLP
100 Marine Parkway, Suite 200
Redwood Shores, CA 94065

Re: *Best Buy Co., Inc., et al. v. AU Optronics Corporation, et al.*
Best Buy Co., Inc., et al. v. Toshiba Corp., et al.
In Re TFT-LCD Antitrust Litigation
10-cv-4572 SI / 12-cv-4114 SI / 3:07-md-1827 SI

Dear Counsel:

Attached please find the declaration of Panasonic personnel Hirohisa Ikutomi certifying documents as business records pursuant to Federal Rules of Evidence 902(11) or (12). The underlying documents were included in Plaintiffs' Joint Initial Exhibit List or Plaintiffs' Supplemental Exhibit List and were the subject of the Track 1B Plaintiffs' Request for Judicial Notice. We provided you with pinpoint citations to these documents, as well as the documents supporting our proposed stipulation, on June 18, 2013.

Also attached is a revised stipulation that accounts for the corporate relationships established by the Ikutomi declaration, as well as the Obata and Ushijima declarations provided to you on July 22, 2013. With the exception of the Toshiba relationships, we still have not heard from you regarding the corporate relationships set forth in the proposed stipulation we gave you on July 18, 2013.

ATLANTA

BOSTON

LOS ANGELES

MINNEAPOLIS

NAPLES

NEW YORK

July 24, 2013

Page 2

We have now given you sworn declarations sufficient to establish the authenticity and the business records nature of the documents underlying our proposed stipulation regarding undisputable corporate relationships. Please confirm that we have your consent to file the stipulation. If you have any objection, tell us the basis for the objection now. Should you refuse to stipulate to the facts set forth in the stipulation, we will ask the Court to charge the time spent in introducing the documents against Defendants' trial time.

Very truly yours,

ROBINS, KAPLAN, MILLER & CIRESI L.L.P.

/s/ David Martinez

David Martinez

Castiglioni, Lilia C

From: Martinez, David
Sent: Wednesday, July 31, 2013 11:54 AM
To: Robert Freitas (RFreitas@ftklaw.com); Curran, Christopher (ccurran@whitecase.com)
Cc: Jessica Leal (JLeal@ftklaw.com); Geibelson, Michael A.; Martinez, David
Subject: LCD - Ownership Stipulation
Attachments: Letter to Counsel re Declarations.pdf; Declaration of C. Chang (LG).pdf; Declaration of H. Park (LG).pdf; Declaration of J. Jang (LG).pdf; Declaration of D. Dunavan (NEC).pdf; Declaration of K. Ushijima (NEC).pdf; Declaration of S. Obata (NEC).pdf; Decl. of H. Ikutomi (Panasonic).pdf; Declaration of C. Wolfgruber (Philips).pdf; Declaration of K. Lee (Samsung).pdf; Declaration of T. Horiuchi (Sharp).pdf; (84057501)_(1)_07.19.13 Letter to All Counsel re Sharp Declaration and Stip.PDF; Letter to Counsel re Declarations.pdf; 07-18-13 - Letter to counsel re declarations.PDF; (84066899)_(1) Stipulation re Corporate Ownership.DOC; Letter to Counsel re Declarations.pdf

Bob and Chris –

I write to follow up on your conversation with Michael Geibelson this morning.

I attach our prior correspondence to you of July 18, 19 and 24 regarding a proposed stipulation regarding certain corporate ownership facts established by the documents authenticated in the attached Rule 902(12) and 803(6) declarations, which we previously provided you. We are prepared to stipulate to the preservation of any appeal rights you believe you have under ATM Fee.

We also request your stipulation regarding admission into evidence of the guilty pleas of corporate entities and individuals that pled guilty to participating in a conspiracy to fix LCD prices.

David

David Martinez, Esq.
ROBINS, KAPLAN, MILLER & CIRESI L.L.P.
2049 Century Park East | Suite 3400
Los Angeles | California 90067-3208
Tel: 310.552.0130
Fax: 310.229.5800

Celebrating 75 Years of Providing National Legal Solutions